

SIGNATURE PAGE

FINAL PERMIT

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

HAZARDOUS WASTE RENEWAL OPERATING PERMIT

PERMITTEE: PPG INDUSTRIES, INC.

PERMIT NUMBER: LAD008086506-OP-RN-1
Agency Interest # 1255/ Activity #PER19990002

FACILITY LOCATION: 1300 PPG DRIVE
WESTLAKE, LOUISIANA, 70669

This permit is issued by the Louisiana Department of Environmental Quality (LDEQ) under the authority of the Louisiana Hazardous Waste Control Law R.S. 20:2171 et seq., and the regulations adopted thereunder and under the authority of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) to PPG Industries, Inc., (hereafter called the Permittee), to operate a hazardous waste Treatment, Storage and Disposal (TSD) facility located at Baton Rouge, Louisiana, at latitude 30° 13' 027" and longitude 93° 16' 059."

For the purposes of this permit, the "Administrative Authority" shall be the Secretary of the Louisiana Department of Environmental Quality, or his/her designee.

The permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein and the applicable regulations as specified in the permit. Applicable regulations are those which are in effect on the effective date of issuance of this permit.

This permit is based on the assumption that the information provided to LDEQ by the Permittee is accurate. Further, this permit is based in part on the provisions of Sections 206, 212, and 224 of the HSWA of 1984, which modify Section 3004 and 3005 of RCRA. In particular, Section 206 requires corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage or disposal facility seeking a permit, regardless of the time at which waste was placed in such unit.

Section 212 provides authority to review and modify the permit at any time. Any inaccuracies found in the submitted information may be grounds for the termination, modification, revocation, and reissuance of this permit (see LAC 33:V.323) and potential enforcement action. The Permittee must inform the LDEQ of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit shall be effective as of January 30, 2009, and shall remain in effect until January 30, 2019, unless revoked, reissued, modified or terminated in accordance with LAC 33:V.323 and 705 of the Louisiana Hazardous Waste Regulations. The Administrative Authority may issue any permit for a duration that is less than the maximum term of ten (10) years and the term shall not be extended beyond the maximum duration by modification in accordance with LAC 33:V.315.

Provisions of this permit may be appealed in writing pursuant to LA. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. A request for hearing must be sent to the following:

Louisiana Department of Environmental Quality
Office of the Secretary
Attention: Hearings Clerk, Legal Services Division
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302



Cheryl Sonnier Nolan, Assistant Secretary
Louisiana Department of Environmental Quality



Date

PUBLIC PARTICIPATION

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
PPG INDUSTRIES, INC.
FINAL HAZARDOUS WASTE OPERATING PERMIT

The LDEQ, Office of Environmental Services, has made the decision to issue the final hazardous waste operating permit renewal for PPG Industries, Inc., P.O. Box 1000, Lake Charles, Louisiana, 70602 for the Westlake Facility. The facility is located at 1300 PPG Drive, Westlake, Louisiana, 70669, Calcasieu Parish.

Under this final hazardous waste operating permit, PPG Industries will operate a halogen acid furnace, two incinerators, storage tanks and container storage areas at their Westlake Facility. The Westlake Facility is involved in the manufacture of chlorine, caustic and chlorinated hydrocarbons as industrial chemicals. The products produced at the Westlake Facility are used by other facilities in the manufacturing of final products. The proposed permit would finalize the conditions under which PPG Industries would operate all the hazardous waste management units at the Westlake Facility.

The final permitting action and related documents are available for review and copying (all documents copied will be subject to a \$0.25 charge per copied page) at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.

An additional copy of this action may be reviewed at the Calcasieu Parish Library-Westlake Branch, 937 Mulberry Street, Westlake, LA 70669-4601 and Calcasieu Parish Library-Sulphur Regional Branch, 1160 Cypress Street, Sulphur, LA 70663-5111.

In accordance with Louisiana Revised Statutes (La R.S.) 30:2024, the Permittee may file with the secretary a request for a hearing no later than thirty (30) days after the notice of the action is served. Under La. R.S. 30:2050.21, any person aggrieved by a final permit action may appeal to the Nineteenth Judicial District Court within 30 days after the notice of the action has been given.

Previous notices have been published in The Advocate and The American Press on Thursday, July 17, 2008.

Inquiries or requests for additional information regarding this permit action, should be directed to Will F. Steele, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3134.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmailrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the issued permit and associated information can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm

All correspondence should specify AI Number 1255, Permit Number LAD008086506-OP-RN-1, and Activity Number PER19990002.

Scheduled for publication: Thursday, December 25, 2008

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04/30/07

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

December 18, 2008

Mr Kishor Fruitwala, Ph.D, P.E.
U. S. EPA, Region VI
Chief RCRA Facility Assessment (6PD-A)
1445 Ross Avenue
Dallas, Texas 75202-2733
Telephone: (214) 665-6750

Re: Final Decision on a Hazardous Waste Operating Renewal Permit
PPG Industries, Inc.
Westlake, Calcasieu Parish
AI 1255, Permit No. LAD008086506, Activity No. PER19990002

Dear Mr. Fruitwala:

For your review, enclosed is a copy of the Public Notice and a copy of the Final Decision on a Hazardous Waste Operating Renewal Permit for the above referenced facility.

Please complete the attached verification form and mail it to: Heather Manry, LDEQ-OES, Permit Support Services Division, Post Office Box 4313, Baton Rouge, Louisiana 70821-4313, or Fax it to: (225) 325-8206.

We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3279 or e-mail me at Heather.Manry@la.gov.

Sincerely,

A handwritten signature in cursive script that reads "Heather Manry".

Heather Manry
Environmental Project Specialist, Public Participation Group

HM

Attachments/2

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

December 18, 2008

Mr. Gerald Perry
PPG Industries, Inc.
Post Office Box 1000
Lake Charles, LA 70602

Re: Final Decision on a Hazardous Waste Operating Renewal Permit
PPG Industries, Inc.
Westlake, Calcasieu Parish
AI 1255, Permit No. LAD008086506, Activity No. PER19990002

Dear Mr. Perry:

For your review, enclosed is a copy of the Public Notice and a copy of the Final Decision on a Hazardous Waste Operating Renewal Permit for the above referenced facility.

We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3279 or e-mail me at Heather.Manry@la.gov.

Sincerely,

A handwritten signature in cursive script that reads "Heather Manry".

Heather Manry
Environmental Project Specialist
Public Participation Group

HM/Attachment



State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

December 18, 2008

Telephone: (337) 527-7200

Ms. Ester Pennington
Sulphur Regional Branch
1160 Cypress Street
Sulphur, LA 70663-5111

Re: **Final Decision on a Hazardous Waste Operating Renewal Permit**
PPG Industries, Inc.
Westlake, Calcasieu Parish
AI 1255, Permit No. LAD008086506, Activity No. PER19990002

Dear Ms. Pennington:

We request that the enclosed public notice and Final Decision on a Hazardous Waste Operating Renewal Permit for the referenced facility be made available for public review upon receipt. It is imperative that these documents are available for review at all times; therefore, they cannot be checked out by anyone at any time.

The documents should be retained during the permitting process. At the close of the permitting period, the Louisiana Department of Environmental Quality, Office of Environmental Services (LDEQ-OES), Permits Division, will provide written notice to you requesting that the information be removed.

We appreciate your assistance in our efforts to serve the public. If you have any questions, please call Ms. Heather Manry at (225) 219-3279.

Sincerely,

A handwritten signature in cursive script that reads "Heather Manry".

Heather Manry
Environmental Project Specialist
Public Participation Group

HM

Attachments/1

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

December 18, 2008

Telephone: (337) 437-3571

Ms. Danielle McGavock
Westlake Branch
937 Mulberry Street
Westlake, LA 70669-4601

Re: Final Decision on a Hazardous Waste Operating Renewal Permit
PPG Industries, Inc.
Westlake, Calcasieu Parish
AI 1255, Permit No. LAD008086506, Activity No. PER19990002

Dear Ms. McGavock:

We request that the enclosed public notice and Final Decision on a Hazardous Waste Operating Renewal Permit for the referenced facility be made available for public review upon receipt. It is imperative that these documents are available for review at all times; therefore, they cannot be checked out by anyone at any time.

The documents should be retained during the permitting process. At the close of the permitting period, the Louisiana Department of Environmental Quality, Office of Environmental Services (LDEQ-OES), Permits Division, will provide written notice to you requesting that the information be removed.

We appreciate your assistance in our efforts to serve the public. If you have any questions, please call Ms. Heather Manry at (225) 219-3279.

Sincerely,

A handwritten signature in cursive script that reads "Heather Manry".

Heather Manry
Environmental Project Specialist
Public Participation Group

HM

Attachments/1

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

December 18, 2008

Phone #: 337-433-0691
Fax #: 337-433-9350

Mayor Dan Cupit
Westlake City Hall-Mayor's Office
1001 Mulberry Street
Westlake, LA 70669

Re: **Final Decision on a Hazardous Waste Operating Renewal Permit** _____
PPG Industries, Inc.
Westlake, Calcasieu Parish
AI 1255, Permit No. LAD008086506, Activity No. PER19990002

Dear Mayor Cupit:

For your review, enclosed is a copy of the Public Notice and a copy of the Final Decision on a Hazardous Waste Operating Renewal Permit for the above referenced facility.

Please complete the attached verification form and mail it to: Heather Manry, LDEQ-OES,
Permit Support Services Division, Post Office Box 4313, Baton Rouge, Louisiana 70821-4313, or
Fax it to: (225) 325-8206.

We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3279 or e-mail me at Heather.Manry@la.gov.

Sincerely,

A handwritten signature in cursive script that reads "Heather Manry".

Heather Manry
Environmental Project Specialist, Public Participation Group

HM

Attachments/2

PART A

APPLICATION

United States Environmental Protection Agency
HAZARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact (See instructions on page 35)	First Name: Esther		MI: S	Last Name: Liggio
	Phone Number: 337-708-4326			Phone Number Extension:
2. Facility Permit Contract Mailing Address (See instructions on page 35)	Street or P.O. Box: P. O. Box 1000			
	City, Town or Village: Lake Charles			
	State: LA			
	County: Calcasieu			Zip Code: 70602-1000
3. Legal Owner Mailing Address and Telephone Number (See instructions on page 35)	Street or P.O. Box: One PPG Place			
	City, Town or Village: Pittsburgh			
	State: PA			
	County:	Zip Code: 15272	Phone Number: 412-434-3131	
4. Operator Mailing Address and Telephone Number (See instructions on page 35)	Street or P.O. Box: P.O. Box 1000			
	City, Town or Village: Lake Charles			
	State: LA			
	County: Calcasieu	Zip Code: 70602-1000	Phone Number: 337-708-4500	
5. Facility Existence Date (See instructions on page 36)	Facility Existence Date (mm/dd/yyyy): 07/1970			

Other Environmental Permits (See instructions on page 36)

A. Permit Type (Enter Code)	B. Permit Number	C. Description
N	LA0000761	NPDES/LPDES Permit
P	PSD-LA-520, PSD LA-637	PSD Permit for Brine Fields and RSCogen
R	GD508-11, LAD008086506, LAD008086506-PC-MO-1	Interim Status RCRA Operating Permit, Hazardous Waste Permit, Post-Closure Permit
F	Attached	
E	Attached	

7. Nature of Business (Provide a brief description; see instructions on page 37)

PPG Industries, Inc., Lake Charles, LA is a heavy industrial chemical manufacturing facility producing both inorganic and halogenated (C2) organic compounds, including the following: Chlorine, Sodium Hydroxide, Amorphous Silica Products, Perchloroethylene, Trichloroethylene, Muriatic Acid, Vinyl Chloride, Methyl Chloroform, Sodium Silicate, Ethylene Dichloride, Hydrogen, Ethyl Chloride, Trans-1,2-Dichloroethene

8. Process Codes and Design Capacities (See instructions on page 37)

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D98, S99, T04 and X99), describe the process (including its design capacity) in the space provided in item 9.

B. PROCESS DESIGN CAPACITY - For each code entered in column A, enter the capacity of the process.

- 1. AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
- 2. UNIT OF MEASURE** - For each amount entered in column B(1), enter the code in column B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.

C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units for each corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
D79	Disposal - Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour
D80	Landfill	Acre-feet; Hectare-meters; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour
D81	Land Treatment	Acres or Hectares	T83	Aggregate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour
D99	Other Disposal	Any Unit of Measure Listed Below	T86	Blast Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour
S01	Storage - Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T87	Smelting, Melting, or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour
S03	Waste Pile	Cubic Yards or Cubic Meters	T89	Methane Reforming Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour
S04	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T90	Pulping Liquor Recovery Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards	T91	Combustion Device Used in The Recovery Of Sulfur Values From Spent Sulfuric Acid	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T92	Halogén Acid Furnaces	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour
S99	Other Storage	Any Unit of Measure Listed Below	T93	Other Industrial Furnaces Listed in 40 CFR §266.10	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour
T01	Treatment - Tank Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	T94	Containment Building - Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	X01	Miscellaneous (Subpart X)	Any Unit of Measure Listed Below
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour	X02	Open Burning/Open Detonation Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Hour; or Million Btu Per Hour	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
T84	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour	X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meters; Gallons; or Liters
			X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G	Short Tons Per Hour	D	Cubic Yards	Y
Gallons Per Hour	E	Metric Tons Per Hour	W	Cubic Meters	C
Gallons Per Day	U	Short Tons Per Day	N	Acres	A
Liters	L	Metric Tons Per Day	S	Acre-feet	S
Liters Per Hour	H	Pounds Per Hour	J	Hectares	Q
Liters Per Day	V	Kilograms Per Hour	R	Hectare-meter	F
		Million Btu Per Hour	X	Btu Per Hour	I

8. Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 8 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number	A. Process Code (From list above)				B. PROCESS DESIGN CAPACITY		(2) Unit of Measure (Enter Code)	C. Process Total Number Of Units	For Official Use Only
	1	2	3	4	(1) Amount (Specify)				
1	S	O	1		5 3 3 7 8 8	G	001		
2	T	O	3		1 1 0, 0 0 0	J	2		
3	S	O	2		1 1 5, 0 0 0	G	4		
4	T	9	2		9, 0 0 0	J	1		
5	S	0	1		- 1 0 0	Y	1		
6					-				
7					-				
8					-				
9					-				
10					-				
11					-				
12					-				
13					-				

NOTE: IF you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item 9.

9. Other Processes (See instructions on page 37 and follow instructions from Item 8 for D99, S99, T04 and X99 process codes)

Line Number	A. Process Code (From list above)				B. PROCESS DESIGN CAPACITY		(2) Unit of Measure (Enter Code)	C. Process Total Number Of Units	D. Description of Process
	1	2	3	4	(1) Amount (Specify)				
1	D	9	9		1 5 0, 0 0 0	Y	1	Corrective Action Management Unit	
2									
3									
4									
5									
6									

10. Description of Hazardous Wastes (See instructions on page 37)

- A. EPA HAZARDOUS WASTE NUMBER** – Enter the four digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261, Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** – For each listed waste entered in column A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** – For each quantity entered in column B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate the waste will be stored, treated, and/or disposed at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- Enter the first two as described above.
- Enter '000' in the extreme right box of Item 10.D(1)
- Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 10.E.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in Item 10.D(2) or in Item 10.E(2)

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous waste that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on the line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 10 (shown in line numbers X-1, X-2, X-3, and X-4 below) – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA Hazardous Waste No. (Enter Code)					B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
	(1) PROCESS CODES (Enter code)							(2) PROCESS DESCRIPTION (If a code is not entered in D(1))									
	T	0	3	D	8						0						
X 1	K	0	5	4	900	P	T	0	3	D	8	0					
X 2	D	0	0	2	400	P	T	0	3	D	8	0					
X 3	D	0	0	1	100	P	T	0	3	D	8	0					
X 4	D	0	0	2												Included With Above	

10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

Line Number	A. EPA Hazardous Waste No. (Enter Code)					B. Estimate d Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES										(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
	(1) PROCESS CODES (Enter code)																	
	S	0	2	T	0			3	T	9		2						
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	2	F	0	0	2													INCLUDED ABOVE
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	5	K	0	1	8													INCLUDED ABOVE
	6	K	0	1	9													INCLUDED ABOVE
	7	K	0	2	0													INCLUDED ABOVE
	8	K	0	2	8													INCLUDED ABOVE
	9	K	0	3	0													INCLUDED ABOVE
1	0	K	0	9	5													INCLUDED ABOVE
1	1	K	0	9	6													INCLUDED ABOVE
1	2	U	0	0	2													INCLUDED ABOVE
1	3	U	0	4	3													INCLUDED ABOVE
1	4	U	0	7	7													INCLUDED ABOVE
1	5	U	0	7	8													INCLUDED ABOVE
1	6	U	0	7	9													INCLUDED ABOVE
1	7	U	2	1	0													INCLUDED ABOVE
1	8	U	0	8	0													INCLUDED ABOVE
1	9	U	2	2	6													INCLUDED ABOVE
2	0	U	2	2	7													INCLUDED ABOVE
2	1	U	2	2	8													INCLUDED ABOVE
2	2	U	1	5	9													INCLUDED ABOVE
2	3	U	0	7	6													INCLUDED ABOVE
2	4	D	0	0	1													INCLUDED ABOVE
2	5	D	0	0	2													INCLUDED ABOVE
2	6	D	0	0	3													INCLUDED ABOVE
2	7	D	0	0	6													INCLUDED ABOVE
2	8	D	0	0	7													INCLUDED ABOVE
2	9	D	0	0	8													INCLUDED ABOVE
3	0	D	0	0	9													INCLUDED ABOVE
3	1	D	0	1	1													INCLUDED ABOVE
3	2	D	0	1	8													INCLUDED ABOVE
3	3	D	0	1	9													INCLUDED ABOVE
3	4	D	0	2	1													INCLUDED ABOVE
3	5	D	0	2	2													INCLUDED ABOVE
3	6	D	0	2	7													INCLUDED ABOVE
3	7	D	0	2	8													INCLUDED ABOVE
3	8	D	0	2	9													INCLUDED ABOVE
3	9	D	0	3	0													INCLUDED ABOVE
3	0	D	0	3	2													INCLUDED ABOVE
4	1	D	0	3	3													INCLUDED ABOVE
4	2	D	0	3	4													INCLUDED ABOVE

10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES											
				(1) PROCESS CODES (Enter code)										(2) PROCESS DESCRIPTION (If a code is not entered in D(1))	
4	3	D 0 3 5												INCLUDED ABOVE	
4	4	D 0 3 9												INCLUDED ABOVE	
4	5	D 0 4 0												INCLUDED ABOVE	
4	6	D 0 4 2												INCLUDED ABOVE	
4	7	D 0 4 3												INCLUDED ABOVE	
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10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

Line Number		A. EPA Hazardous Waste No. (Enter Code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES										(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
								(1) PROCESS CODES (Enter code)										
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8	8	F	0	0	2													Included Above
8	9	F	0	0	3													Included Above
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9	2	F	0	2	4													Included Above
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9	5	K	0	1	9													Included Above
9	6	K	0	2	0													Included Above
9	7	K	0	2	8													Included Above
9	8	K	0	3	0													Included Above
9	9	K	0	9	5													Included Above
1	00	K	0	9	6													Included Above
1	01	U	0	0	2													Included Above
1	02	U	0	0	6													Included Above
1	03	U	0	1	9													Included Above
1	04	U	0	3	7													Included Above
1	05	U	0	4	3													Included Above
1	06	U	0	4	4													Included Above
1	07	U	0	7	6													Included Above
1	08	U	0	7	7													Included Above
1	09	U	0	7	8													Included Above
1	10	U	0	7	9													Included Above
1	11	U	0	8	0													Included Above
1	12	U	0	9	5													Included Above
1	13	U	1	0	8													Included Above
1	14	U	1	4	7													Included Above
1	15	U	1	5	4													Included Above
1	16	U	1	5	9													Included Above
1	17	U	1	8	8													Included Above
1	18	U	1	9	6													Included Above
1	19	U	2	1	0													Included Above
1	20	U	2	1	3													Included Above
1	21	U	2	2	0													Included Above
1	22	U	2	2	6													Included Above
1	23	U	2	2	7													Included Above
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1	25	U	2	3	9													Included Above
1	26	D	0	0	1													Included Above
1	27	D	0	0	2													Included Above
1	28	D	0	0	3													Included Above

10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

Line Number	A. EPA Hazardous Waste No. (Enter Code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES											
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1	29	D	0	0	4												Included Above	
1	30	D	0	0	5												Included Above	
1	31	D	0	0	6												Included Above	
1	32	D	0	0	7												Included Above	
1	33	D	0	0	8												Included Above	
1	34	D	0	1	1												Included Above	
1	35	D	0	1	8												Included Above	
1	36	D	0	1	9												Included Above	
1	37	D	0	2	1												Included Above	
1	38	D	0	2	2												Included Above	
1	39	D	0	2	5												Included Above	
1	40	D	0	2	7												Included Above	
1	41	D	0	2	8												Included Above	
1	42	D	0	2	9												Included Above	
1	43	D	0	3	0												Included Above	
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10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

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10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

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						(1) PROCESS CODES (Enter code)										
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10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

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11. Map (See instructions on page 38)

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluid underground. Include all springs, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

Please see Figure 4 for drainage and effluent discharges.

12. Facility Drawing (See instructions on page 39)

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

See Figure 1 of Part II.

13. Photographs (See instructions on page 39)

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

Please see attached photographs.

14. Comments (See instructions on page 39)

ADDITIONAL ENVIRONMENTAL PERMITS
RCRA OPERATING PERMIT
PPG INDUSTRIES, INC.
LAKE CHARLES, LOUISIANA
LAD008086506
AI 1255

PERMIT NUMBER	PERMIT DESCRIPTION
0520-00210-00	Small Source Permit for Sulphur Brine Field
0520-00211-00	Small Source Permit for Starks Brine Field
LAG480545	Starks Brine Field General Permit
LAG480546	Sulphur Brine Fields General Permit
2040-V0	Incinerators - Title V Permit
2085-V0	Silicas - Title V Permit
2106-V2	Power/Utilities - Title V Permit
2206-V0	Derivatives Docks - Title V Permit
2216-V0	Waste Recovery Unit - Title V Permit
2229-V1	Derivatives Shipping - Title V Permit
2231-V0	Mercury Cell - Title V Permit
2269-V0	Wastewater - Title V Permit
2270-V0	Per/Tri - Title V Permit
2350-V0	Greater EDC - Title V Permit
2359-V0	Complex Support - Title V Permit
2695-V0	TE-2 - Title V Permit
2798-V0	Chlor-Alkali Plant - Title V Permit
3021-V0	Membrane - Title V Permit
897-V0	VC Production - Title V Permit
38 Nationwide	Nationwide 38

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BODY OF PERMIT

FINAL
HAZARDOUS WASTE OPERATING RENEWAL PERMIT

PPG Industries, Inc
EPA ID# LAD008086506
Agency Interest# 1255

Calcasieu Parish
Westlake, Louisiana
PER19990002
Permit Number LAD008086506-OP-RN-1

I. PERMIT PREAMBLE

This permit is issued to PPG Industries Inc., hereinafter referred to as the Permittee, by the Louisiana Department of Environmental Quality (LDEQ) under authority of the Louisiana Hazardous Waste Control Law, R.S. 30:2171 et seq., and the regulations adopted thereunder.

For the purposes of the permit, "Administrative Authority" shall mean the Secretary of the Department of Environmental Quality, or his/her designee.

This permit is based on information submitted in the permit application, and all subsequent amendments, and on the applicant's certification that such information is accurate and that all facilities were or will be maintained and operated as specified in the application.

This permit is conditioned upon full compliance with all applicable provisions of the Louisiana Hazardous Waste Control Law, R.S. 30:2171 et. Seq., and the regulations adopted thereunder.

GLOSSARY OF TERMS

For the purpose of this Permit, terms used herein shall have the same meaning as those in LAC 33:V.Subpart 1 unless the context of use in this Permit clearly indicates otherwise. Where terms are not otherwise defined, the meaning otherwise associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

“Administrative Authority” means the Secretary of the Department of Environmental Quality or his designee or the appropriate assistant secretary or his designee.

“Application” refers to the RCRA Part B Permit Application and subsequent amendments submitted by the Permittee for obtaining a Permit.

“CWA” means Clean Water Act.

“Corrective Action” is an activity conducted to protect human health and the environment.

“Continuous Emission Monitoring System (CEMS)” A continuous monitor is one in which the sample to be analyzed passes the measurement section of the analyzer without interruption, and which evaluates the detector response to the sample at least once every 15 seconds and computes and records the results at least every 60 seconds. A CEMS consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, the analyzer(s), and the data recording/processing hardware and software.

“Department” means the Louisiana Department of Environmental Quality.

“Dense Nonaqueous Phase Liquid (DNAPL)” a dense liquid not dissolved in water, commonly referred to as “free product.”

“EPA” means the United States Environmental Protection Agency.

“HSWA” means the 1984 Hazardous and Solid Waste Amendments to RCRA.

“Hazardous Waste Constituent” is any substance specified as a hazardous waste in any list in these rules and regulations (LAC 33:V. Hazardous Waste, Subpart 1).

“LDEQ” means the Louisiana Department of Environmental Quality.

“Light Nonaqueous Phase Liquid (LNAPL)” a light liquid not dissolved in water, commonly referred to as “free product.”

“Newly-discovered Release” any release(s) of hazardous waste, including hazardous waste constituents, in which there is a statistically significant increase over the background data for the media of concern, during the course of groundwater monitoring, field investigation, environmental auditing, or by other means.

“Operating Record” means written or electronic records of all maintenance, monitoring, inspection, calibration, or performance testing—or other data as may be required—to demonstrate compliance with this Permit, document noncompliance with this Permit, or document actions taken to remedy noncompliance with this Permit. The minimum list of documents that must be included in the operating record is identified at LAC 33:V.1529.B.

“Permittee” means PPG Industries Inc., 1300 PPG Drive, Westlake, Louisiana 70669, Calcasieu Parish.

“RCRA Permit” means the full permit, with RCRA and HSWA portions.

“RFA” means RCRA Facility Assessment.

“RFI” means RCRA Facility Investigation.

“Release” means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping or disposing of hazardous wastes (including hazardous constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).

“SARA” means Superfund Amendments and Reauthorization Action of 1986.

“Solid Waste Management Unit” (SWMU) means any discernable unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released.

“Stabilization” is an action taken for the purpose of controlling or abating threats to human health or the environment from releases or preventing or minimizing the further spread of contaminants while long-term remedies are pursued.

All regulating citations are defined as being the regulations in effect on the date of issuance of this permit. New and/or amended regulations are not included as Permit requirements until permit modification procedures as specified in Condition II.C of the permit and LAC 33:V.321 are completed.

II. GENERAL PERMIT CONDITIONS

II.A. DURATION OF PERMIT

This permit is effective as of the date indicated on the accompanying signature page and shall remain in effect for a maximum period of ten (10) years from the effective date, unless suspended, modified, revoked and reissued or terminated for just cause.

II.B. EFFECT OF PERMIT

This permit authorizes the Permittee to store and treat hazardous waste in accordance with the conditions of this permit. The Permittee is prohibited from any storage, treatment or disposal of hazardous waste not authorized by statute, regulation or this permit. Compliance with this permit, LAC 33:V.Subpart 1 and HSWA, constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA and Chapter 9 of the Louisiana Environmental Quality Act (Act). However, compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Condition 3013 or Condition 7003 of RCRA, or under Condition 106 (a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) {42 U.S.C. 9606 (a)}.

In accordance with LAC 33:V.307.B and C, issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations.

II.C. PERMIT ACTIONS

Any inaccuracies found in the permit application may be cause for revocation or modification of this permit. The Permittee must inform the Administrative Authority of any deviation from, changes or inaccuracies in the information in the permit application.

The Administrative Authority may also suspend, modify, revoke and reissue, or terminate for cause when necessary to be protective of human health or the environment as specified in 40 CFR 270.41, 270.42, 270.43 or LAC 33:V.309.F, 311.A or 323. The Administrative Authority may modify and reopen the permit when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations or by judicial decision after the permit was issued. The filing of a request for permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of Permittee does not stay the applicability or enforceability of any permit condition.

II.D. SEVERABILITY

The conditions of this permit are severable and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

II.E. DUTIES AND REQUIREMENTS

II.E.1. Duty to Comply

The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance may be authorized by an emergency permit, as described in LAC 33:V.701. Any permit noncompliance, other than noncompliance authorized by an emergency permit, constitutes a violation of the LAC 33:V.Subpart 1 and the Environmental Quality Act and is grounds for enforcement action which may include permit termination, permit revocation and reissuance, permit modification, or denial of permit renewal application.

II.E.2. Duty to Reapply

If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must reapply for the permit as required by the LAC 33:V.303.N and 309.B. Notification shall be at least 180 calendar days before the permit expires.

II.E.3. Permit Extension

This permit and all conditions herein will remain in effect beyond the permit's expiration date until the Administrative Authority issues a final decision on the re-application, provided the Permittee has submitted a timely, complete new permit application as provided in LAC 33:V.309.B and 315.A.

II.E.4. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

II.E.5. Duty to Mitigate

The Permittee shall immediately take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit as required by LAC 33:V.309.D.

II.E.6. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related ancillary equipment) that are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate

quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

II.E.7. Duty to Provide Information

The Permittee shall furnish to the Administrative Authority, within a reasonable time, any information which the Administrative Authority may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Administrative Authority upon request, copies of records required by this permit and in accordance with LAC 33:V.309.H.

II.E.8. Inspection and Entry

The Permittee shall allow the Administrative Authority or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

II.E.8.a. enter upon the Permittee's premises where a regulated activity is located or conducted, or where records must be maintained under the conditions of this permit;

II.E.8.b. have access to and copy, at reasonable times, any records that must be maintained under the conditions of this permit;

II.E.8.c. inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operation regulated or required under this permit; and

II.E.8.d. sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Administrative Authority any substances or parameters at any location.

II.E.9. Sample Monitoring and Records

II.E.9.a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, "SW-846", latest revision; Manual of Ground Water Quality Sampling Procedures, 1981, EPA-600/2-81-160, as revised; Procedures Manual for Ground Water Monitoring at Solid Waste Disposal Facilities, 1977, EPA-530/SW-611, as revised; or an equivalent method as specified in the attached Waste Analysis Plan referenced in Attachment 1.

II.E.9.b. Records of monitoring information shall include:

- II.E.9.b.(1). the date, exact place, and time of sampling or measurements;
- II.E.9.b.(2). the name(s) and signature(s) of the individual(s) who performed the sampling or measurements;
- II.E.9.b.(3). the date(s) analyses were performed;
- II.E.9.b.(4). the name(s) and signature(s) of the individual(s) who performed the analyses;
- II.E.9.b.(5). the analytical techniques or methods used;
- II.E.9.b.(6). the results of such analyses; and
- II.E.9.b.(7). associated quality assurance performance data.

II.E.9.c. Laboratory Quality Assurance/Quality Control

In order to ensure the accuracy, precision, and reliability of data generated for use, the Permittee shall submit a statement, certified as specified in LAC 33:V.513 and included in the annual report, indicating that:

II.E.9.c.(1). any commercial laboratory providing analytical results and test data to the Department required by this permit is accredited by the Louisiana Environmental Laboratory Accreditation Program (LELAP) in accordance with LAC 33:I. Subpart 3, Chapter 45. Laboratory data generated by commercial laboratories not accredited under LELAP will not be accepted by the Department.

LAC 33:I.Subpart 3 (Chapters 45-49) provides requirements for the accreditation program. Regulations and a list of labs that have applied for accreditation are available on the LDEQ website located at: <http://www.deq.louisiana.gov/portal/tabid/2412/Default.aspx>.

In accordance with LAC 33:V.4501, the requirements for LELAP accreditation applies whenever data is:

- submitted on behalf of a facility;
- required as part of a permit application;
- required by order of the LDEQ;
- required to be included in a monitoring report submitted to the LDEQ;
- required to be submitted by contract; or
- otherwise required by the LDEQ regulations.

This includes, but is not limited to, data from RCRA Trial Burns, Risks Burns, Risk Assessments, MACT Comprehensive Performance Tests, and data used for continuing compliance demonstrations.

II.E.9.c.(2). If the Permittee decides to use its own in-house laboratory for test and analysis, the laboratory is not required to be accredited by LELAP. However, the laboratory must document all quality assurance/quality control procedures used to generate data for the LDEQ.

II.E.9.c.(3). For approval of equivalent testing or analytical methods, the Permittee may petition for a regulatory amendment under LAC 33:V.105.I and LAC 33:I.Chapter 9. In cases where an approved methodology for a parameter/analyte is not available or listed, a request to utilize an alternate method shall be submitted to the Administrative Authority for approval. Documentation must be submitted to the LDEQ that will verify that the results obtained from the alternate method are equal to or better than those obtained from EPA-accepted methods, as well as those deemed equivalent by the LDEQ.

II.E.10. Retention of Records

The Permittee shall maintain records through the active life of the facility (including operation, closure and post-closure periods) as required by LAC 33:V.309.J and LAC 33:V.1529.A, B, and C. All records, including plans, must be furnished upon request and made available at all reasonable times as required by LAC 33:V.1529.C. File copies shall be kept for LDEQ Inspection for a period of not less than three years as required by LAC 33:V.317.B.

The Permittee shall, for the life of the permit, maintain records of all data used to complete the application for this permit and any supplemental information submitted under the Louisiana Hazardous Waste Control Law (LA. R.S. 30:2171 et seq.).

II.E.11. Notices of Planned Physical Facility Changes

The Permittee shall give notice to the Administrative Authority, as soon as possible, of any planned physical alterations or additions to the permitted facility, in accordance with LAC 33:V.309.L.1.

II.E.12. Physical Facility after Modification

For any new or existing unit being modified, the Permittee may not manage hazardous waste in the modified portion of the unit until the unit is complete and:

II.E.12.a. the Permittee has submitted to and received approval from the Administrative Authority, by certified mail or hand delivery, a letter signed by the

Permittee and an independent registered professional engineer stating that the unit is complete and has been constructed or modified in compliance with the permit; and

II.E.12.b. the Administrative Authority has inspected the modified unit following a request to make final inspection by the Permittee and finds it is in compliance with the conditions of the permit and all applicable sections of LAC 33:V.Subpart 1, and has issued an Order to Proceed. The Permittee may then commence treatment, storage, or disposal of hazardous waste.

II.E.13. Anticipated Noncompliance

The Permittee shall give advance notice to the Administrative Authority of any planned changes in the permitted facility or activity that may result in noncompliance with permit requirements.

II.E.14. Transfer of Permits

This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to LAC 33:V.309.L.4, 321.B, 321.C.4, and 1531.D and E, as applicable.

II.E.15. Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than fourteen (14) days following each schedule date as required by LAC 33:V.309.L.6.

II.E.16. Emergency Unauthorized Discharge Notification

In accordance with LAC 33:I.3915, in the event of an unauthorized discharge of hazardous waste that results in an emergency condition (an emergency condition is any condition which could be reasonably expected to endanger the health and safety of the public, cause significant adverse impact to the land, water, or air environment, or cause severe damage to property), the Permittee shall notify the DPS (Department of Public Safety) 24-hour Louisiana Emergency Hazardous Materials Hotline by telephone at (225) 925-6595 immediately, but in no case later than one (1) hour after learning of the discharge. The DPS 24-hour Louisiana Emergency Hazardous Materials Hotline will subsequently notify the Department regarding the details of the discharge.

II.E.17. Non-Emergency Unauthorized Discharge Notification

In accordance with LAC 33:I.3917, in the event of an unauthorized discharge of hazardous waste that exceeds a reportable quantity specified in LAC 33:I.Chapter 39.Subchapter E and/or results in contamination of the groundwaters of the state but does

not result in an emergency condition, the Permittee shall promptly notify the Department within twenty-four (24) hours after learning of the discharge. Notification shall be made to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC) in accordance with the procedure and content requirements specified in LAC 33:I.3923.

II.E.18. Unauthorized Discharge to Groundwater Notification

In accordance with LAC 33:I.3919, in the event of an unauthorized discharge of hazardous waste resulting in contamination of groundwaters of the state by moving in, into, within or on any saturated subsurface strata, the Permittee shall promptly notify the Department within twenty-four (24) hours after learning of the discharge. Notification shall be made to the Office of Environmental Compliance, Emergency and Radiological Services Division, SPOC in accordance with the procedure and content requirements specified in LAC 33:I.3923.

II.E.19. Written Notification Reports for Unauthorized Discharges

The Permittee shall submit written reports to the SPOC for any unauthorized discharges of hazardous waste requiring notification under Condition II.E.16 through Condition II.E.18. The written report shall be submitted in accordance with the procedure and content requirements specified in LAC 33:I.3925.

II.E.20. Noncompliance Reporting

The Permittee shall report orally within twenty-four (24) hours any noncompliance with the permit not reported under Condition II.E.16 through Condition II.E.18 that may endanger the human health or the environment. This report shall include at minimum the following information:

II.E.20.a. information concerning the release of any hazardous waste that may endanger public drinking water supplies; and

II.E.20.b. information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, that could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

II.E.20.b.(1). name, address, and telephone number of the owner or operator;

II.E.20.b.(2). name, address, and telephone number of the facility;

II.E.20.b.(3). date, time, and type of incident;

II.E.20.b.(4). name and quantity of materials involved;

II.E.20.b.(5). the extent of injuries, if any;

II.E.20.b.(6). an assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

II.E.20.b.(7). estimated quantity and disposition of recovered material that resulted from the incident.

II.E.21. Follow-up Written Report of Noncompliance

The Permittee shall provide a written submission within five (5) days after the time the Permittee becomes aware of any noncompliance which may endanger human health or the environment and reported under Condition II.E.20. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. If the Administrative Authority waives the requirement, then the Permittee submits a written report within fifteen (15) days after the time the Permittee becomes aware of the circumstances, as required by LAC 33:V.309.L.7.

II.E.22. Other Noncompliance

The Permittee shall report all instances of noncompliance not reported under Conditions II.E.11, II.E.13, II.E.15 and II.E.20, at the time required monitoring reports are submitted. The reports shall contain the information listed in Conditions II.E.11 and II.E.20.

II.E.23. Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or that it submitted incorrect information in a permit application, or in any report to the Administrative Authority, the Permittee shall promptly submit such facts or information.

II.E.24. Signatory Requirement

All applications, reports or other information submitted to the Administrative Authority shall be signed and certified according to LAC 33:V.507, 509, 511, and 513.

II.E.25. Schedule of Compliance

II.E.25.a. Forty-five (45) days after the effective date of this permit, the Permittee must submit to the Administrative Authority calculations clearly

indicating how minimum tank thicknesses contained in Table 4 of this permit were derived.

II.E.26. Additional Operating Standards

(RESERVED)

II.E.27. Updated Documents To Be Submitted Prior To Operation

(RESERVED)

II.E.28. Documents To Be Maintained at Facility Site

II.E.28.a. The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and any amendments, revisions, and modifications to these documents. Any revision or changes shall be submitted with the annual report unless previously submitted.

II.E.28.a.(1). Waste Analysis Plan submitted in accordance with LAC 33:V.1519 and approved by the Administrative Authority (see Attachment 1).

II.E.28.a.(2). Personnel Training Plan and the training records as required by LAC 33:V.1515 (see Attachment 1).

II.E.28.a.(3). Contingency Plan submitted in accordance with LAC 33:V.1513 and approved by the Administrative Authority (see Attachment 1).

II.E.28.a.(4). Arrangements with local authorities in accordance with LAC 33:V.1511.G (see Attachment 1).

II.E.28.a.(5). Closure Plans submitted in accordance with LAC 33:V.3511 and approved by the Administrative Authority, as well as any post-closure care requirements that may be required initially or through permit modifications in accordance with LAC 33:V.3523 (see Attachment 1).

II.E.28.a.(6). Cost estimate for facility closure care submitted in accordance with LAC 33:V.3705 and approved by the Administrative Authority, as well as any post-closure cost estimate that may be required initially or through permit modifications in accordance with LAC 33:V.3709 (see Attachment 1).

II.E.28.a.(7). Operating Records and Operations Plans referenced as required by LAC 33:V.1529, 1911.D, and 3007.K (see Attachment 1).

II.E.28.a.(8). Inspection Plan developed in accordance with LAC 33:V.517.G and 1509.B and approved by the Administrative Authority (see Attachment 1).

II.E.28.a.(9). Security Plan developed in accordance with LAC 33:V.1507 (see Attachment 1).

II.E.28.b. All proposed amendments, revisions and modifications to any plan or cost estimates required by this permit shall be submitted to the Administrative Authority for approval.

II.E.29. Annual Report

The Permittee shall submit an annual report covering all hazardous waste units and activities during the previous calendar year as required by LAC 33:V.1529.D.

II.E.30. Manifest

The Permittee shall report manifest discrepancies and un-manifested waste as required by LAC 33:V.309.L.8 and 9 and LAC 33:V.1107.

II.E.31. Emissions

Emissions from any hazardous waste facility shall not violate the Louisiana Air Quality Regulations. If air quality standards are exceeded, the site will follow air regulation protocol.

II.E.32. Water Discharges

Water discharges from any hazardous waste facility shall not violate the Louisiana Water Quality Regulations. If water standards are exceeded, the site will follow water quality regulation protocol.

II.E.33. Non-Listed Hazardous Waste Units

This permit is issued for those hazardous waste Units listed in Condition IV (Permitted Units). If the Permittee determines that an un-permitted hazardous waste TSD facility exists that does not have a permit when a permit is required, the Permittee must immediately notify the Administrative Authority in accordance with Condition II.E.22 of the General Permit Conditions.

II.E.34. Compliance With Land Disposal Restrictions

The Permittee shall comply with those land disposal restrictions set forth in LA. R.S. 30:2193, all regulations promulgated thereunder, and Condition VII of this permit.

II.E.35. Establishing Permit Conditions

Permits for facilities with pre-existing groundwater contamination are subject to all limits, conditions, remediation and corrective action programs designated under LAC 33:V.311.D and LAC 33:V.3303. All groundwater monitoring requirements for the PPG Westlake facility are addressed under Permit No. LAD008086506-PC-RN-1, not this permit.

II.E.36. Obligation for Corrective Action

Owners or operators of hazardous waste management units must have all necessary permits during the active life of the unit and for any period necessary to comply with the corrective action requirements in Condition VIII. The Permittee is obligated to implement facility-wide corrective action regardless of the operational status of the facility. Facility-wide corrective action requirements have been specified in the HSWA section of the facility's post-closure permit for the WTU Surge Pond Permit No. LAD008086506-PC1, not this permit.

II.E.37. Attachments and Documents Incorporated by Reference

All attachments and documents required by this permit, including all plans and schedules, are incorporated, upon approval by the Administrative Authority, into this permit by reference and become an enforceable part of this permit. When applicable, the Permittee must modify the permit according to LAC 33:V.Chapter 3. Since required items are essential elements of this permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject the Permittee to enforcement action, which may include fines, suspension, or revocation of the permit. Also, where applicable, the Permittee must meet all the permit modification requirements contained in LAC 33:V.321, 322, and 323.

Any noncompliance with approved plans and schedules shall be termed noncompliance with this permit. Written requests for extension of due dates for submittals may be granted by the Administrative Authority.

If the Administrative Authority determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Administrative Authority may modify this permit according to procedures in LAC 33:V.321.

III. GENERAL FACILITY CONDITIONS

III.A. DESIGN AND OPERATION OF ALL FACILITIES

III.A.1. The Permittee must maintain and operate all facilities to minimize the possibility of a fire, explosion, or any unauthorized sudden or non-sudden release of hazardous waste constituents to air, soil, or water that could threaten human health or the environment.

III.A.2. The Permittee shall not receive for treatment, storage, or disposal any hazardous waste generated outside the United States or its territories, in accordance with LA. R.S. 30:2189 of the Louisiana Environmental Quality Act.

III.B. REQUIRED NOTICE

(RESERVED)

III.C. GENERAL WASTE ANALYSIS

The Permittee shall follow the procedures described in the Waste Analysis Plan referenced in Attachment 1 and in accordance with LAC 33:V.1519.

III.C.1. The Permittee shall review the Waste Analysis Plan annually and report to the Administrative Authority in the annual report whether any revision is required to stay abreast of changes in EPA methods and/or State regulatory provisions.

III.C.2. Annually, the Permittee shall submit a certified statement that indicates that any on-site or off-site laboratory, by contract or agreement with the Permittee, that provides chemical analyses, analytical results, or other test data to the department, by contract or by agreement, is accredited in accordance with the laboratory accreditation requirements of LAC 33:1.Chapter 45. This written statement shall be certified as specified in LAC 33:V.513 and included in the annual report. This documentation shall be resubmitted when a different laboratory is contracted for services. This condition does not apply to laboratories owned and operated by the Permittee.

III.C.3. If there is reason to believe that the hazardous waste has changed or the operation generating the hazardous waste has changed, the Permittee shall review and re-characterize all potentially impacted hazardous waste streams generated by the Permittee on-site and treated, stored, and/or disposed on-site. The Permittee must re-characterize wastes in accordance with LAC 33:V.1519.A.3. This re-characterization shall include laboratory analyses which provide information needed to properly treat, store, and dispose of the hazardous waste, including physical characteristics and chemical components of the waste. The results of this re-characterization shall be summarized in the Permittee's Annual Report.

III.C.4. In accordance with LAC 33:V.1519.B, the Waste Analysis Plan must meet all sampling and QA/QC protocols contained in Condition II.E.9. All test procedures used by the Permittee shall be maintained on file by the Permittee and made available to the LDEQ upon request.

III.D. SECURITY

The Permittee must comply with the security provisions of LAC 33:V.1507, as referenced in Attachment 1.

III.E. GENERAL INSPECTION REQUIREMENTS

The Permittee must follow the approved Inspection Plan referenced in Attachment 1. The Permittee must remedy any deterioration or malfunction discovered by an inspection as required by LAC 33:V.1509.C. Records of inspections must be kept as required by LAC 33:V.1509.D. The inspection schedule must include the regulatory requirements of LAC 33:V.517.G, 1509, 1911, 2109, 3007.J, and 3119.

III.F. PERSONNEL TRAINING

The Permittee must conduct personnel training as required by LAC 33:V.1515.A, B, and C. The Permittee shall follow the approved Personnel Training Plan referenced in Attachment 1. The Permittee shall maintain all training documents and records as required by LAC 33:V.1515.D and E.

III.G. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee must take precautions as required by LAC 33:V.1517 to prevent accidental ignition or reaction of ignitable or reactive wastes. The Permittee shall store ignitable, reactive, or incompatible wastes only in accordance with LAC 33:V.1517, 1917, 1919, 2113, and 2115.

III.H. LOCATION STANDARDS

III.H.1. The Permittee has furnished that it is in compliance with seismic standards as required by LAC 33:V.517.T.

III.H.2. The Permittee must not manage any hazardous waste on any portion of the property that lies within the 100 year flood plain (as identified in the Flood Insurance Rating Map) unless such areas are raised above this flood level or other means (e.g., levees) are provided to protect such areas from washouts, overtopping by wave action, soil erosion or other effects of such a flood as required by LAC 33:V.1503.B.3. Such site improvements must be certified by independent licensed professional engineers and approved by the Administrative Authority prior to any hazardous waste and/or hazardous waste units being placed thereon.

III.I. PRECIPITATION RUN-ON AND RUN-OFF

The Permittee must provide for the control by diversion and/or containment of run-on and run-off resulting from a rainfall occurring during a period of twenty-four (24) hours as defined by local rainfall records and LAC 33:V.1503.B.2. The Permittee shall comply with the requirements of LAC 33:V.1907.E.1.b and LAC 33:V.2111.B.4.

III.J. HURRICANE EVENTS

The Permittee must initiate those applicable portions of the Contingency Plan during a hurricane as well as appropriate actions required by LAC 33:V.1507, 1509 and 1511.

III.K. PREPAREDNESS AND PREVENTION

III.K.1. Required Equipment

At a minimum, the Permittee must install and maintain the equipment set forth in the Contingency Plan, as required by LAC 33:V.1511.C.

III.K.2. Testing and Maintenance of Equipment

The Permittee must test and maintain the equipment specified in Condition III.K.1 to insure its proper operation in time of emergency. The testing and maintenance of the equipment must be documented in the operating record.

III.K.3. Access to Communications or Alarm Systems

The Permittee must maintain access to the communications or alarm system as required by LAC 33:V.1511.E.1 and 1511.E.2.

III.K.4. Required Aisle Space

In no case shall aisle space be less than two (2) feet. In addition, the Permittee shall maintain adequate aisle space as required by LAC 33:V.1511.F.

III.K.5. Arrangements with Local Authorities

The Permittee shall maintain documentation on site that the requirements of LAC 33:V.1511.G have been met. This documentation shall include those state and local agencies involved and those facilities and operations covered. Where state or local authorities decline to enter into such arrangements, the Permittee must document the refusal in the operating record.

Any changes in the Arrangements with Local Authorities must be documented in the latest approved Contingency Plan and submitted to the administrative authority as a

permit modification. The Permittee must document such changes in the annual report by reference to the latest approved Contingency Plan.

III.L. CONTINGENCY PLAN

III.L.1. Implementation of Plan

The Permittee must immediately carry out the provisions of the approved Contingency Plan referenced in Attachment 1, and follow the emergency procedures described by LAC 33:V.1513.F whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that threaten or could threaten human health or the environment.

III.L.2. Copies of Plan

The Permittee must comply with the requirements of LAC 33:V.1513.C.

III.L.3. Amendments to Plan

The Permittee must review and immediately amend, if necessary, the Contingency Plan as required by LAC 33:V.1513.D.

III.L.4. Emergency Coordinator

The Permittee must comply with the requirements of LAC 33:V.1513.E concerning the emergency coordinator.

III.M. MANIFEST SYSTEM

The Permittee shall comply with the manifest requirements of LAC 33:V.Chapter 11.

III.N. RECORDKEEPING AND REPORTING

III.N.1. Operating Record

The Permittee shall maintain a written operating record at the facility in accordance with LAC 33:V.1529.A, B, and C and the approved Operations Plan referenced in Attachment 1.

III.N.2. Annual Report

The Permittee must comply with the annual report requirements of LAC 33:V.1529.D.

III.N.3. Operations Manual

The Permittee shall compile and keep current an operations manual covering all aspects of the Permittee's storage Units.

III.O. CLOSURE/POST-CLOSURE

The Permittee shall address the following regulatory citations in the closure plan: LAC 33:V.1915, 2117, 3005.I, 3121, 3503, 3505, 3507, 3509, 3511, 3513, and 3515. The Administrative Authority may re-evaluate the adequacy of the approved closure plan and/or the confirmatory sampling procedures prior to the commencement of closure (e.g., permit renewal applications, permit modifications, notifications of intent to close).

III.O.1. Closure Performance Standard

The Permittee shall close the facility in accordance with the approved Closure Plan referenced in Attachment 1 and in accordance with the applicable sections of LAC 33:V.3507.

III.O.2. Amendment to Closure Plan

The Permittee shall amend the Closure Plan where necessary, in accordance with LAC 33:V.3511.C. Any modification shall be subject to LAC 33:V.321, 322 and 323, where applicable

III.O.3. Notification of Closure

The Permittee shall notify the Administrative Authority at least forty-five (45) days prior to the date it expects to begin closure in accordance with LAC 33:V.3511.D.

III.O.4. Time Allowed For Closure

After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan referenced in Attachment 1 and in accordance with LAC 33:V.3513.

III.O.5. Disposal or Decontamination of Equipment

The Permittee shall decontaminate and dispose all facility equipment in accordance with the approved Closure Plan referenced in Attachment 1 and in accordance with LAC 33:V.3515.

III.O.6. Certification of Closure

The Permittee shall certify that the facility has been closed in accordance with the specifications in the approved Closure Plan as required by LAC 33:V.3517.

III.O.7. Inventory at Closure

The Permittee shall be responsible for closure cost based upon the maximum permitted facility inventories listed below in Tables 1, 2 and 3. Maximum permitted facility inventory does not apply to the combustion units listed in Table 3.

III.P. POST-CLOSURE

The Permittee must attempt to clean close all hazardous waste units. If the facility cannot be clean closed, the Permittee shall submit a post-closure plan for approval by the Administrative Authority. If some waste residues or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519-3527, including maintenance and monitoring throughout the post-closure care period.

III.Q. COST ESTIMATE FOR CLOSURE/POST-CLOSURE

III.Q.1. The Permittee must maintain cost estimates for closure of facilities in accordance with LAC 33:V.3705 and 3707.

III.Q.2. The Permittee shall maintain and adjust the closure cost estimate for inflation, as specified in LAC 33:3705.B, 3705.C, and for other circumstances that increase the cost of closure.

III.Q.3. The Permittee must adjust the closure cost estimate within thirty (30) days after approval by the Administrative Authority of any request to modify the closure plan in accordance with LAC 33:V.3705.C. The Permittee shall consider the impact of any inventory and/or process changes on the closure cost estimate.

III.Q.4. The closure cost estimate must equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure most expensive and must be based on costs to the Permittee of hiring a third party to execute all closure activities. The closure cost estimate shall be based on the maximum permitted inventory of each facility as specified in Condition III, Tables 1, 2 and 3.

III.Q.5. If the Permittee is unable to complete clean closure of all facilities referenced in Condition III, Tables 1, 2 and 3 as per LAC 33:V.Chapter 35 and as acceptable by the Administrative Authority, a Post-Closure Plan must be submitted for each facility failing to achieve clean closure within ninety (90) days from the date that the Permittee or Administrative Authority determines that the unit must be closed as a landfill. The Post-Closure Plan must meet the requirements of LAC 33:V.3523.B.

III.R. FINANCIAL ASSURANCE FOR CLOSED UNITS

The Permittee shall establish and maintain financial assurance for closure in accordance with LAC 33:V.3707 for all treatment, storage and disposal units listed in the Condition IV of this permit.

III.S. LIABILITY REQUIREMENTS

The Permittee shall have and maintain liability coverage for sudden accidental occurrences in the amounts of \$1,000,000 each occurrence and \$2,000,000 annual aggregate, exclusive of legal defense costs, as required by LAC 33:V.3715.A. The Permittee shall have and maintain liability coverage for non-sudden accidental occurrences in the amounts of \$3,000,000 each occurrence and \$6,000,000 annual aggregate, exclusive of legal defense costs, as specified in LAC 33:V.3715.B.

III.T. INCAPACITY OF THE PERMITTEE

The Permittee must comply with LAC 33:V.3717 whenever bankruptcy is initiated for the Permittee or its institutions providing financial assurance. If insurance is used for compliance with LAC 33:V.3715, the Permittee must immediately notify the Administrative Authority if the insurance company is placed in receivership. The Permittee must establish other financial assurance or liability coverage within sixty (60) days after such an event.

III.U. POST-CLOSURE NOTICES

(RESERVED)

IV. PERMITTED UNITS

IV.A. TANKS

The tanks listed in Table 1 below are permitted to store hazardous waste consistent with the conditions of this permit. Details of the existing tanks listed in Table 1, including design and operational specifications, are contained in Condition V.A.

TABLE 1
(4) Existing Hazardous Waste Tanks

TANKS	SERVICE	WASTE	MAXIMUM PERMITTED CAPACITY (GALLONS)
60-1187	Liquid Waste Storage	The waste codes accepted at these units are referenced in the Part A of this permit.	33000
60-1188	Liquid Waste Storage		33000
60-1867	Liquid Waste Storage		23000
60-2735	Liquid Waste Storage		26000

IV.B. CONTAINER STORAGE

The container storage areas listed in Table 2 below are permitted to store hazardous waste in containers and roll-off boxes that are properly labeled and sealed containers which have been specified for this purpose and are compatible with the contained waste. The drums and roll-off boxes shall be stored in accordance with LAC 33:V.2109.

TABLE 2
(4) Existing Container Storage Areas

CONTAINER STORAGE	LOCATION	WASTE	MAXIMUM PERMITTED CAPACITY
RCRA 1	South Terminal	Assorted F, K, U, D listed wastes (See Part A Form Page 7-8)	1000 Drums or 55, 000 gallons (27,500 gallons waste containing free liquids)
RCRA 2	Derivatives	Assorted F, K, U, D listed wastes (See Part A Form Page 7-8)	708 Drums or 38, 940 gallons (28,050 gallons waste containing free liquids)
Mercury Recovery Unit	Chlor-Alkali	D009, K106, U151 (Waste Solids containing no free liquids)	100 cubic yards or 20,197gallons (waste stored in various containers, roll-off boxes, covered hoppers and drums)
Mercury Drum Storage Area	Chlor-Alkali	D009, K106, U151 (Waste Solids containing no free liquids)	100 Drums or 5500 gallons

IV.C. COMBUSTION UNITS

The combustion units listed in Table 3 below are permitted to treat hazardous waste consistent with the conditions of this permit. Details of the existing combustion units listed in Table 3, including design and operational specifications, are contained in Permit Conditions V.B through V.D.

TABLE 3
(3) Existing Combustion Units

COMBUSTION UNIT	SERVICE	LOCATION
NCIN-1	Liquid Hazardous Waste	Derivatives
NCIN-2	Liquid Hazardous Waste	Derivatives
No. 3 Halogen Acid Furnace	Liquid Hazardous Waste	Derivatives

V. PERMIT CONDITIONS APPLICABLE TO PERMITTED UNITS

V.A. TANKS

V.A.1. Description of Tank Systems

V.A.1.a. Operation

V.A.1.a.(1). All permitted tanks and associated piping, pumps, instruments, containments, and vent controls shall be operated and maintained in accordance with LAC 33:V.Chapter 19 and the specifications and design criteria provided herein.

V.A.1.a.(2). The Permittee shall operate and maintain all permitted tanks and containment systems according to the specifications, design criteria, and design limits specified in Table 4.

V.A.1.a.(3). The design temperature and pressure for each tank listed in Table 4 shall not change unless a permit modification is requested by the Permittee and subsequently approved by the Administrative Authority.

V.A.1.b. Permitted Tanks

V.A.1.b.(1). The tanks listed in Table 4 are permitted for hazardous waste storage. These tanks have been certified by an independent, professional engineer licensed in the State of Louisiana and have sufficient structural integrity for the storage of hazardous waste.

V.A.1.b.(2). The tanks listed in Table 4 must be clearly marked with the words "Hazardous Waste".

V.A.1.b.(3). The Permittee is prohibited from storing or treating hazardous waste in any tank storage system not listed in Table 4 for greater than ninety (90) days, unless an extension is granted by the Administrative Authority, or an Emergency Permit is issued.

V.A.1.b.(4). The Permittee is prohibited from receiving any hazardous waste from offsite, other than waste received from other PPG facilities that are approved in this permit. The Permittee may not receive, treat, store or dispose of hazardous waste for a fee or other consideration without modifying this permit to meet the requirements of LAC 33:V.Chapter 4.

V.A.1.c. Proposed Tanks

(RESERVED)

**TABLE 4
DESIGN AND OPERATING PARAMETERS FOR RCRA TANK SYSTEMS**

Tank No.	Year Put Into Service	Service	Materials of Construction	Dimensions and Permitted Capacity	Design Standard	Inspection Standard	Design Temp. And Pressure	Nominal Built Thickness (inches)	Minimum Thickness (inches)	Secondary Containment Type and Capacity
60-1187	1973	Liquid Waste Storage	SA-285-C	O.D.=17'3" H=17'3" 33,000 Gal	ASME Sec. VIII Div. 1	API 510	29 PSIG @ 350F	2 nd ring: 7/16" 1 st ring: 1/2" btm: 1/2" top: 7/16"	0.256"	External Liner 147,000 gallons
60-1188	1973	Liquid Waste Storage	SA-285-C	O.D.=17'3" H=17'3" 33,000 Gal	ASME Sec. VIII Div. 1	API 510	29 PSIG @ 350F	2 nd ring: 7/16" 1 st ring: 1/2" btm: 1/2" top: 7/16"	0.256"	External Liner 147,000 gallons
60-1867	1979	Liquid Waste Storage	SA-516-70	I.D.=12'0" H=24' 23,000 Gal	ASME Sec. VIII Div. 1	API 510	30 PSIG @ 300F	2 nd ring: 1/2" 1 st ring: 3/4" btm: 5/8" top: 9/16"	0.190"	External Liner 147,000 gallons
60-2735	1993	Liquid Waste Storage	SA-516-70	I.D.=15'0" H=20'0" 26,000 Gal	API 620	API 620	12 PSIG @ 250F	2 nd ring: 1/2" 1 st ring: 3/4" btm: 5/8" top: 9/16"	0.0792"	External Liner 147,000 gallons

V.A.2. Permitted and Prohibited Wastes

V.A.2.a. Permitted Waste

Subject to the terms of this permit, the Permittee is allowed to store in the tanks as described in Condition V.A.1.b, and the hazardous wastes identified in the most current RCRA Subtitle C Site Identification Form (Part A Permit Application).

V.A.2.b. Prohibited Waste

The Permittee is prohibited from storing hazardous waste that is not identified in the most current RCRA Subtitle C Site Identification Form (Part A Permit Application), except as provided in LAC 33:V.322.F.4. This prohibition does not apply to storage units managed in accordance with LAC 33:V.1109.E.

V.A.3. Secondary Containment

V.A.3.a. Duty to Comply with LAC 33:V.1907.B through F

The Permittee shall design, construct, operate, and maintain the secondary containment system in accordance with LAC 33:V.1907.B through F and Table 4 of this permit. Secondary containment must contain an impervious coating or material capable of preventing lateral or vertical migration of accumulated liquid and wastes.

V.A.3.b. Prevention of Migration

V.A.3.b.(1). Secondary containment systems must be maintained and operated to prevent any migration of wastes or accumulated liquid out of the system to the soil, groundwater, or surface water at any time during the use of the tank system in accordance with LAC 33:V.1907.B.1.

V.A.3.b.(2). Ancillary equipment must be provided with secondary containment, except as excluded by LAC 33:V.1907.F.

V.A.3.b.(3). Secondary containment systems must be free of cracks or gaps and other surface defects that would allow liquid to migrate out of the containment system in accordance with LAC 33:V.1907.E.

V.A.3.b.(4). Spilled or leaked waste and/or accumulated precipitation must be removed from the secondary containment system within twenty-four (24) hours in accordance with LAC 33:V.1907.C.4.

V.A.3.b.(5). If unable to remove spilled or leaked waste and/or

accumulated precipitation within twenty-four (24) hours, the Permittee must demonstrate to the Administrative Authority that more time is required and propose an alternate schedule for removal.

V.A.3.c. Requirements for Facilities Requesting a Variance

(RESERVED)

V.A.4. OPERATING REQUIREMENTS

V.A.4.a. Duty to Comply with LAC 33:V.1909.A

The Permittee shall comply with LAC 33:V.1909.A. Hazardous wastes or treatment reagents must not be placed in a tank system if they could cause the tank, its ancillary equipment, or the containment system to rupture, leak, corrode, or otherwise fail.

V.A.4.b. Duty to Comply with LAC 33:V.1909.B

The Permittee shall comply with LAC 33:V.1909.B and Table 4 of this permit. The Permittee must use appropriate controls and practices to prevent spills and overflows from tanks and containment systems.

V.A.4.c. Tank Covers

All hazardous waste storage tanks shall be covered and shall not be vented directly to the atmosphere if the tanks are used to store, or if a possibility exists that they may be used to store, volatile or malodorous waste.

V.A.4.d. Maintenance

The Permittee shall maintain the permitted tank systems according to the design code specified for each tank as listed in Table 4 and shall not exceed the listed operating conditions.

V.A.5. Ignitable, Reactive, and Incompatible Wastes

The Permittee shall store ignitable, reactive, or incompatible wastes only in accordance with LAC 33:V.1517.B, 1917 and 1919.

V.A.6. Inspections

V.A.6.a. Inspection Schedule

The Permittee shall comply with LAC 33:V.1911.A through C by following the inspection schedule submitted in the Inspection Plan (see Attachment 1).

V.A.6.b. Daily Inspection

V.A.6.b.(1). At least once per day while the tank is operating in hazardous waste service, the Permittee shall inspect the following:

V.A.6.b.(1).a. Aboveground portions of the tank system, including the tank, ancillary piping, valves, and vent controls, to detect corrosion, cracks or releases of waste.

V.A.6.b.(1).b. Data gathered from monitoring and leak detection equipment.

V.A.6.b.(1).c. The construction materials and area immediately surrounding the externally accessible portion of the tank system and ancillary equipment, e.g. secondary containment system, to detect erosion, cracks and signs of hazardous waste releases.

V.A.6.b.(2). All deficiencies noted during daily inspections must be recorded and remedied in a timely manner.

V.A.6.c. External Inspection

At a minimum, external inspection of each tank covered by this permit shall be performed as often as required by the API designated inspection standard in Table 4. The required frequency of inspection with reference to the applicable section of the standard shall be kept on site and available for review by the Administrative Authority upon request. The inspection shall be performed by a person meeting the minimum qualifications required under the inspection standard in Table 4. The inspection checklist shall be comparable to that in API Standard 510 or 653 as applicable.

If the result of such an inspection reveals that the tank is unfit for continued service, the Permittee shall immediately stop the flow of hazardous waste into the tank and comply with LAC 33:V.1913. The certification required by LAC 33:V.1913.F shall be obtained before the tank is put back into service.

V.A.6.d. Internal Inspection

Internal inspection of each tank covered by this permit shall be performed every 3 years, unless a longer interval is authorized by the administrative authority. The inspection shall be performed by a person meeting the minimum qualifications required under the inspection standard in Table 4. The inspection checklist shall be comparable to that in API Standard 510 or 653 as applicable.

If the result of such an inspection reveals that the tank is unfit for continued service, the Permittee shall immediately stop the flow of hazardous waste into the tank and comply with LAC 33:V.1913. The certification required by LAC 33:V.1913.F shall be obtained before the tank is put back into service.

V.A.6.e. Thickness Testing

V.A.6.e.(1). Thickness testing of each metallic tank covered by this permit shall be performed in conjunction with an internal inspection performed as required under Condition V.A.6.d of this permit, and according to the inspection standard given in Table 4.

V.A.6.e.(2). Tank thickness measurements shall be taken on the tank top, bottom, and shell. In addition, the measurements shall be taken at least on each tank quadrant. Tank thickness readings shall be taken in the same place during each testing event in order to form a comparison of readings for corrosion rate determination.

V.A.6.e.(3). Thickness testing of the tank bottom shall be performed as often as the internal inspection, or more often if required by the inspection standard specified in Table 4. The required frequency of inspection with reference to the applicable section of the inspection standard shall be kept onsite and made available to the Administrative Authority upon request.

V.A.6.e.(4). Tank thickness readings shall also be taken at any spot where visual corrosion or compromised integrity is evident.

V.A.6.e.(5). When any tank shell thickness measurement at a single point is less than that required in Table 4, the Permittee shall immediately comply with either Condition V.A.6.e.(5).a or b below. Condition V.A.6.e.(5).b shall not be used for any tank where the shell thickness measurement is less than 0.100 inches.

V.A.6.e.(5).a. When a tank is deemed unfit for use, the Permittee shall immediately stop the flow of hazardous waste into the tank and comply with LAC 33:V.1913. The tank shall be repaired or

replaced and the certification required by LAC 33:V.1913.F shall be obtained before the tank is put back into service.

V.A.6.e.(5).b. An engineering evaluation shall be performed, conforming to the appropriate standard or standards, as allowed by the design or inspection standard in Table 4. If the evaluation determines that the tank is unfit for service, the Permittee shall comply with Condition V.A.6.e.(5).a immediately. The evaluation must be submitted to the Waste Permits Division for approval within forty-five (45) days of the initial measurement.

V.A.6.e.(6). Tank thickness measurements shall not be averaged, unless allowed under the tank inspection standard in Table 4. Averaging of tank thickness measurements shall be brought to the attention of the Administrative Authority.

V.A.6.f. Overfill Controls

Tank operators shall check and record tank gauges each operating day. Overfill controls shall be tested to ensure that they are in working order according to the schedule proposed in the Inspection Plan (see Attachment 1).

V.A.6.g. Fiberglass Tanks

(RESERVED)

V.A.7. Response to Leaks and Spills

V.A.7.a. Duty to Comply with LAC 33:V.1913.A through E

In the event of a leak or spill from a tank system, secondary containment system, or if a system becomes unfit for use, the Permittee shall comply with LAC 33:V.1913.A through E.

V.A.7.b. Leaks and Spills

V.A.7.b.(1). Upon discovering a leak or spill, the Permittee must immediately stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of the release.

V.A.7.b.(2). Within twenty-four (24) hours of detecting a leak from the tank system, or in as timely a manner as is practical if the Permittee demonstrates that it is not possible to remove the waste within twenty-four

(24) hours, the Permittee must remove as much waste as necessary to prevent further release from the tank or secondary containment system and to allow inspection and repair of the tank system in accordance with LAC 33:V.1913.B.

V.A.7.b.(3). Any spilled material or material trapped in sumps that is a hazardous waste or that will be disposed of as a hazardous waste must be cleaned up in a timely manner, as required by LAC 33:V.1505.C.3.

V.A.7.b.(3).a. If the collected material is discharged through a point source to United States waters or to a Publicly Owned Treatment Works, it is subject to the requirements of the Clean Water Act.

V.A.7.b.(3).b. If the collected material is released to the environment, it may be subject to reporting under applicable requirements of LAC 33:V.1505, LAC 33:I.Chapter 39, and 40 CFR Part 302.

V.A.7.b.(4). When a leak or spill occurs, the Permittee shall remove and properly dispose of any visible contamination of the soil or surface water in accordance with LAC 33:V.1913.C.2.

V.A.7.b.(5). A tank system from which a leak or spill has occurred must be closed in accordance with the approved Closure Plan and LAC 33:V.1915, unless the requirements of LAC 33:V.1913.E.2-3 are satisfied.

V.A.7.b.(5).a. For a release caused by a spill that has not damaged the integrity of the system, the Permittee shall remove the released waste and make any necessary repairs to fully restore the integrity of the system before returning the tank system to service in accordance with LAC 33:V.1913.E.2.

V.A.7.b.(5).b. For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning the tank to service in accordance with LAC 33:V.1913.E.3.

V.A.7.b.(6). If the Permittee replaces a component of the tank system to eliminate a leak, that component must satisfy the requirements for new tank systems or components in LAC 33:V.1905 and 1907.

V.A.7.b.(7). All leaks and spills shall be documented in the daily inspection log.

V.A.7.c. Major Repairs

V.A.7.c.(1). The Permittee shall comply with LAC 33:V.1913.F when performing major repairs to a tank system.

V.A.7.c.(2). Major repairs shall include, but not be limited to, installation of an internal liner, repair of a ruptured tank, repair of a ruptured secondary containment area, and removal of a tank from its foundation for any reason.

V.A.7.c.(3). The Permittee shall conform to the appropriate portion of the most recent inspection code listed in Table 4 for maintenance, inspection, re-rating, repair, and alteration of all tanks.

V.A.7.c.(4). The tank shall not be returned to service unless the Permittee has obtained a certification by an independent professional engineer licensed in the State of Louisiana that the system is capable of handling hazardous waste without release for the intended life of the system. The certification of repairs shall include an inspection in accordance with the requirements of any applicable codes, such as API 510 or API 653. The certification shall be submitted to the Administrative Authority within seven (7) days of returning the tank system to use in accordance with LAC 33:V.1913.F.

V.A.8. Air Emission Control Equipment Standards

(RESERVED)

Note: In order to prevent redundant regulation, this condition and Condition VII.B (AA-BB Air Regulations) have been reserved. The Permittee will comply with the air emission control equipment standards by complying with the provisions of its Consolidated Fugitive Emissions Monitoring Program implemented under the facility air permit(s). Failure by the Permittee to comply with those provisions that are equivalent to the provisions in LAC 33:V.Chapter 17 will also result in a failure to comply with LAC 33:V.Chapter 17.

V.A.9. Recordkeeping and Reporting

V.A.9.a. New Tanks

In the event any new tank systems are installed, the Permittee shall obtain, and keep on file at the facility, the written statements by those persons required to certify the design and installation of new tank systems, in accordance with LAC 33:V.1905.G.

V.A.9.b. Written Assessment

The Permittee shall keep on file at the facility, written assessments of the tank systems' integrity. The assessments shall be updated at the time of submittal of a Permit Renewal Application and/or at any other time deemed necessary by the Administrative Authority (i.e., permit modifications, tank replacements, tank repairs, etc.).

V.A.9.c. Inspections

V.A.9.c.(1). The Permittee shall document in the operating record for the facility inspection of those items in Condition V.A.6.a and b.

V.A.9.c.(1).a. The daily log sheets shall include all monitored parameters for the prevention of spills and overflows, including temperature, pressures, and levels.

V.A.9.c.(1).b. The Permittee shall note all deficiencies discovered during the inspection in the inspection log.

V.A.9.c.(1).c. Corrective action taken in response to deficiencies must be included as part of the operating record for the facility.

V.A.9.c.(2). The Permittee shall document in the operating record all tests and inspections of overfilling controls.

V.A.9.c.(3). The Permittee shall keep on file at the facility the results of the internal and external inspections required by Condition V.A.6.c and d. The Permittee shall note all deficiencies discovered during the inspection in the inspection log. Corrective action taken in response to deficiencies must be included as part of the operating record for the facility.

V.A.9.c.(4). The Permittee shall keep on file at the facility all information related to tank thickness testing required under Condition V.A.6.e.

V.A.9.c.(4).a. This information shall include at a minimum the date(s) of assessment, the location where measurement readings are taken, the raw measurement data, comparison of actual reading to minimum thickness requirements, the corrosion rate, and calculation of remaining tank life.

V.A.9.c.(4).b. If an engineering evaluation is performed in accordance with Condition V.A.6.e.(5).b, the results of such an

evaluation shall be kept in the operating record. The engineering evaluation must include, at minimum, details on how the evaluation was performed, references to applicable tank codes, raw data, calculations performed, and an explanation of why the tank is or is not fit for continued service.

V.A.9.c.(4).c. Any tank thickness measurements that are averaged under Condition V.A.6.e.(6) must be supported by documentation with references to the applicable tank codes. The documentation shall include all raw measurement data, calculations, and results of averaging. This information shall be kept as a part of the operating record for the facility.

V.A.9.c.(5). The Permittee shall keep on file at the facility the records of repairs required under Condition V.A.7.c.

V.A.9.d. Releases

V.A.9.d.(1). The Permittee shall keep on file at the facility notification reports submitted under LAC 33:V.1913.D.

V.A.9.d.(2). Within twenty-four (24) hours of detecting a reportable leak or spill from a tank system or secondary containment system to the environment, the Permittee shall report the leak in accordance with either Condition II.E.16 (Emergency Unauthorized Discharge) or Condition II.E.17 (Non-Emergency Unauthorized Discharge).

V.A.9.d.(3). As required by LAC 33:V.1913.D.3, within thirty (30) days of detecting a reportable release to the environment from a tank system or secondary containment system, the Permittee shall report the following information to the Administrative Authority's Single Point of Contact (SPOC):

V.A.9.d.(3).a. Likely route of migration of the release,

V.A.9.d.(3).b. Characteristics of the surrounding soil, including soil composition, geology, hydrogeology, and climate,

V.A.9.d.(3).c. Results of any monitoring or sampling conducted in connection with the release (if available). If the Permittee finds it will be impossible to meet this time schedule, the Permittee must provide the Administrative Authority with a schedule of when the results will be available. This schedule must be provided before the required thirty (30) day submittal period expires,

V.A.9.d.(3).d. Proximity of downgradient drinking water, surface water, and populated areas, and

V.A.9.d.(3).e. A description of response actions taken or planned.

V.A.9.e. Repairs

The Permittee shall keep on file at the facility all certifications required by Condition V.A.7.c.

V.A.10. Closure and Post-Closure Care

V.A.10.a. Duty to Comply with LAC 33:V.1915.A

The Permittee shall comply with LAC 33:V.1915.A by following the procedures specified in the approved Closure Plan, see Attachment 1.

V.A.10.b. Duty to Comply with LAC 33:V.1915.B

If the Permittee demonstrates that not all contaminated soils can be practicably removed or decontaminated in accordance with Condition V.A.10.a, the Permittee shall comply with LAC 33:V.1915.B.

V.A.10.c. Post-Closure

The Permittee shall attempt to clean close all tank systems. If the surface and subsurface soils below and adjacent to the tank system cannot be clean closed and the Permittee has not demonstrated through a risk assessment approved by the Administrative Authority that closure with the remaining contaminant levels is protective of human health and the environment, the Permittee shall present a post-closure plan to the Administrative Authority for approval. If any waste residue or contaminated media are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 through 3527, including maintenance and monitoring throughout the post-closure care period.

V.B. CONTAINER STORAGE

The permit conditions as set forth under this Condition shall apply where applicable, to the permitted container storage areas as designated in Condition IV.B, Table 2.

V.B.1. The Permittee shall be in compliance with all appropriate conditions set forth in LAC 33:V.2101.

V.B.2. The Permittee must transfer hazardous waste from a container that is not in good condition (e.g., severe rusting, apparent structural defects) or is beginning to leak to a container that is in good condition in accordance with LAC 33:V.2103. Alternatively, the Permittee may manage the hazardous waste in a manner that complies with LAC 33:V.Chapter 21.

V.B.3. In accordance with LAC 33:V.2107.A, containers holding hazardous waste always must be closed during storage, except when it is necessary to add or remove waste.

V.B.4. In accordance with LAC 33:V.2107.B, the Permittee must not open, handle or store containers holding hazardous waste in a manner which may rupture the container or cause it to leak.

V.B.5. The Permittee must inspect the containers and storage areas in accordance with LAC 33:V.2109 and LAC 33:V.1509. Results of such inspections must be placed in the operating record in accordance with LAC 33:V.1529.B.8.

V.B.6. Within twenty-four (24) hours of detecting a reportable leak or reportable spill from any container(s), the Permittee shall report the leak or spill in accordance with either Condition II.E.16 (Emergency Unauthorized Discharge) or Condition II.E.17 (Non- Emergency Unauthorized Discharge) of this permit.

V.B.7. The Permittee shall store all wastes in containers that are compatible with the hazardous wastes as required by LAC 33:V.2105. Hazardous wastes being transported offsite must be packaged and labeled in accordance with DOT standards listed in 49 CFR 173 and 178 as required by LAC 33:V.1109 and LAC 33:V.1759.F.

V.B.8. The Permittee must have and operate a containment system for a container storage area containing free liquids in accordance with LAC 33:V.2111.A, B.1, 2, and 4, in a manner such that:

V.B.8.a. the base underlying the containers must be free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed;

V.B.8.b. the base underlying the containers must be sloped or the containment system must be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquid;

V.B.8.c. run-on into the containment system must be prevented unless the collection system has sufficient excess capacity in addition to that required by LAC 33:V.2111.B.3 to contain any run-on which might enter the system.

V.B.9. The Permittee must manage any collected material as required by LAC 33:V.2111.B.6. Storm water shall be contained until an analysis establishes it meets permit limitation criteria for discharge through the NPDES treatment system, or other authorized disposal method. The Permittee must manage any collected storm water as required by LAC 33:V.2111.B.6 and any other applicable regulations.

V.B.10. The Permittee must place and store incompatible, ignitable, and reactive wastes only in accordance with LAC 33:V.1517, 2113, and 2115.

V.B.11. The Permittee shall store hazardous waste (where applicable) on pallets no more than two (2) tiers of pallets high and no more than four (4) large containers per pallet. All containers must be stacked in such a fashion that each container identification label can be read from the access aisle in accordance with LAC 33:V.2109.B. The pallets and roll-off boxes shall be placed in rows with a minimum of two (2) feet of aisle space between rows. For containers with less than forty (40) gallons capacity, two (2) levels of containers may be stored per pallet, provided the containers are consistent in size and are not miss-shaped, bent or broken. Roll-off boxes must remain covered when not in use and must be clearly labeled in order to easily identify hazardous waste.

V.B.12. The Permittee must insure that all hazardous waste personnel receive initial and continued training to insure compliance with LAC 33:V.1515, and maintain an emergency response program in compliance with LAC 33:V.1525.

V.B.13. The Permittee must control and report all point source discharges according to LAC 33:V.1505.

V.B.14. Spilled or leaked waste shall be removed from the sump or other collection area in a timely manner as necessary to prevent overflow of the collection system as required by LAC 33:V.2111.B.5.

V.B.15. Waste analysis and other documentation regarding compatibility testing must be placed in the operating record in accordance with LAC 33:V.2115.D.

V.B.16. The Permittee shall not exceed the maximum capacity listed under Condition IV.B, of this permit for each container storage area listed.

V.B.17. At closure, the Permittee shall adhere to the procedures detailed in the approved closure plan referenced in Attachment 1 of this permit and as required by LAC 33:V.2117 and Chapter 35, Closure Requirements.

A Post-Closure Plan must be submitted for each container storage area failing to achieve clean closure (or an alternate closure standard approved under LAC 33:V.3501.D.2 or LAC 33:V.3507.B.) within 90 days from the date that the Permittee or Administrative

Authority determines that the unit must be closed as a landfill. The Post-Closure Plan must meet the requirements of LAC 33:V.3523.B.

V.B.18. The Permittee shall always maintain enough secondary containment capacity to contain at least ten percent (10%) of the total volume of containers or the volume of the largest container, whichever is greater in accordance with LAC 33:V.2111.B.3. Containers that do not contain free liquids (per the Paint Filter Liquids Test) do not need to be considered in this determination.

V.B.19. Air Emission Control Equipment Standards

All containers are Level 1 containers and are managed according to the standards stated in LAC 33:V.1759 and Condition VII.B.2.

V.C. INCINERATORS

NCIN-1 (Incinerator 1) and NCIN-2 (Incinerator 2) are subject to the following provisions and to 40 CFR 63.Subpart EEE. The Permittee completed a Comprehensive Performance Test (CPT) for Incinerators 1 and 2 on September 25, 2004, followed by a supplementary test on March 13, 2007, to demonstrate compliance with 40 CFR 63 Subpart EEE. LDEQ issued a Finding of Compliance (FOC) on September 24, 2007, and transferred the operating limits to PPG's Title V air permit (No. 2040-V1).

V.C.1. Regulation of Residue

The Permittee shall regulate all hazardous waste combustion residues in accordance with LAC 33:V.3121.

V.C.2. Closure

The Permittee will close this facility in accordance with LAC 33:V.3121, LAC 33:V.Chapter 35 and the closure plan referenced in Attachment 1.

V.C.3. Permitted and Prohibited Waste

V.C.3.a. The Permittee may only burn hazardous waste with EPA waste codes listed in the current Part A except as prohibited in Condition V.C.3.b.

V.C.3.b. Burning the following wastes in Incinerators 1 or 2 is prohibited:

V.C.3.b.1. Dioxin-containing wastes identified by EPA as F020, F021, F022, F023, F026, F027, and F028 wastes in LAC 33:V.4901.

V.C.3.b.2. Source material, special nuclear material, mixed waste, or

naturally occurring radioactive materials (NORM) that are not exempt pursuant to LAC 33:XV.

V.C.3.b.3. Explosive material, as defined by the Department of Transportation under 49 CFR Part 173.

V.C.3.b.4. Municipal Waste.

V.C.3.b.5. Containerized Gases.

V.C.3.b.6. Medical/Infectious wastes as defined in 40 CFR 60.51c.

V.C.3.b.7. Metal bearing wastes listed in LAC 33:V.Chapter 22.Table 12, except as described in LAC 33:V.2207.C.

V.C.3.b.8. Wastes displaying the characteristic of reactivity as defined in LAC 33:V.4903.D.

V.C.3.c. Before burning any wastes not authorized under this Permit, the Permittee shall obtain approval for a permit modification, as required under LAC 33:V.321.

V.D. HALOGEN ACID FURNACE

Permit Conditions For The No. 3 Halogen Acid Furnace

V.D.1. Regulation of Residue

The Permittee shall regulate all hazardous waste combustion residues in accordance with LAC 33:V.3025.

V.D.2. Closure

The Permittee will close this facility in accordance with LAC 33:V.3005.I, LAC 33:V.Chapter 35 and the closure plan referenced in Attachment 1. Closure costs must include allowances for decontaminating the buildings and associated equipment and adjacent contaminated soils.

V.D.3. Direct Transfer of Hazardous Waste

Direct transfer of hazardous waste shall be done only in accordance with LAC 33:V.3023.

V.D.4. Permitted and Prohibited Wastes

V.D.4.a. The Permittee may only burn hazardous wastes with EPA waste codes listed in the current Part I (EPA Part A) Permit Application.

V.D.4.b. Burning the following wastes in the No. 3 Halogen Acid Furnace is prohibited:

V.D.4.b.1. Dioxin-containing wastes identified by EPA as F020, F021, F022, F023, F026, F027, and F028 wastes in LAC 33:V.4901.

V.D.4.b.2. Source material, special nuclear material, mixed waste, or naturally occurring radioactive materials (NORM) that are not exempt pursuant to LAC 33:XV.

V.D.4.b.3. Explosive material, as defined by the Department of Transportation under 49 CFR Part 173.

V.D.4.b.4. Municipal Waste.

V.D.4.b.5. Containerized Gases.

V.D.4.b.6. Medical/Infectious wastes as defined in 40 CFR 60.51c.

V.D.4.b.7. Metal bearing wastes listed in LAC 33:V.Chapter 22.Table 12, except as described in LAC 33:V.2207.C.

V.D.4.b.8. Wastes displaying the characteristic of reactivity as defined in LAC 33:V.4903.D.

V.D.4.c. Before burning any wastes not authorized under this Permit, the Permittee shall obtain approval for a permit modification, as required under LAC 33:V.321.

V.D.5. Operating Conditions

The following operating conditions were established in the Comprehensive Performance Test under 40 CFR 63.Subpart EEE, which was completed on April 28, 2007. Upon issuance of a Finding of Compliance and a Title V permit containing the applicable conditions, the conditions below shall be removed upon approval of a Class 1¹ permit modification by the Administrative Authority.

V.D.5.a. Group A Parameter Limits

The Permittee shall operate the No. 3 Halogen Acid Furnace with a functioning system to automatically cut off waste feed to the combustion unit when operating conditions deviate from those established below. All values are hourly rolling averages or 12 hour rolling averages as specified in Table 5.

V.D.5.a.1. Whenever hazardous waste is in the unit, the hourly rolling average combustion chamber temperature shall be maintained above the minimum value of 2159 °F.

V.D.5.a.2. Whenever hazardous waste is in the unit, the hourly rolling average inlet air flow rate shall be maintained below a maximum of 910,200 standard cubic feet per hour.

V.D.5.a.3. Whenever hazardous waste is in the unit, the hourly rolling average waste feed rate shall be maintained below the maximum value of 8,972 pounds per hour.

V.D.5.a.4. Whenever hazardous waste is in the unit, the hourly rolling average carbon monoxide (CO) level shall be maintained below the maximum value of 100 parts per million by volume, continuously corrected to seven percent oxygen, dry gas basis.

V.D.5.a.5. Whenever hazardous waste is in the unit, the hourly rolling average secondary scrubber liquid to gas ratio shall be maintained above the minimum value of 16 gallons per thousand standard cubic feet.

V.D.5.a.6. Whenever hazardous waste is in the unit, the hourly rolling average secondary scrubber pressure drop shall be maintained above the minimum value of 0.4 inches water column.

V.D.5.a.7. Whenever hazardous waste is in the unit, the hourly rolling average pH of the feed to the wet scrubber shall be maintained above the minimum value of 8.5.

V.D.5.a.8. The combined total chlorine feed rate from all feedstreams shall be no greater than 10,073 pounds per hour.

V.D.5.a.9. Whenever hazardous waste is in the unit, the Permittee shall maintain a minimum atomizing fluid pressure of 40 pounds per square inch, gage.

V.D.5.a.10. The Permittee shall immediately stop the flow of hazardous

waste into the combustion unit should sample flow to the Continuous Emissions Monitoring System (CEMS) cease, outside of normal calibration periods.

V.D.5.a.11. At a minimum, the Permittee shall analyze values from the Continuous Emissions Monitoring System (CEMS) every 15 seconds. The Permittee must record these values every 60 seconds to demonstrate compliance with the monitoring requirements.

TABLE 5

**NO. 3 HALOGEN ACID FURNACE
GROUP A PARAMETER LIMITS
(AUTOMATIC WASTE FEED CUT OFF)**

Control Parameter	Final Operating Limits Automatic Waste Feed Cut Off Point
Minimum combustion zone temperature	2159°F, hourly rolling average
Maximum inlet air flow rate	910,200 scfh, hourly rolling average
Maximum hazardous waste feed rate	8972 lb/hr, hourly rolling average
Maximum stack gas carbon monoxide	100 ppmv, corrected to 7% oxygen on a dry gas basis, hourly rolling average
Minimum secondary scrubber liquid to gas ratio	16 gal/Mscf, hourly rolling average
Minimum secondary scrubber pressure drop	0.4 inches water column, hourly rolling average
Minimum secondary scrubber liquid pH	8.5, hourly rolling average
Maximum total chlorine feed rate	10,073 lb/hr, hourly rolling average
Minimum atomizing fluid pressure	40 psig, hourly rolling average

V.E. RISK-BASED CONDITIONS

(RESERVED)

VI. GROUNDWATER PROTECTION

VI.A. APPLICABILITY

The regulations of Louisiana Administrative Code (LAC), Title 33, Part V, Chapter 3, 5, 15, 19, 21, 33, 35, and 37, and the Louisiana Hazardous Waste Control Law Revised Statute (R.S.) 30:2171 et seq., of the Environmental Quality Control Act, R.S. 30:2001 et seq., and the provisions of this Condition shall apply to ground water protection programs for Units that are used to treat, store, and dispose hazardous wastes at PPG Industries., in Westlake, LA. No permitted units are identified in this permit which are subject to groundwater monitoring at this time.

VI.B. REQUIRED PROGRAMS

If ground water contamination is confirmed as a result of operations related to past or present hazardous waste management units, the Permittee shall establish, expand, or continue assessment and corrective action programs in accordance with the requirements of LAC 33:V.Chapter 3321 and as subsequently directed by the Administrative Authority in the facility's current post-closure permit, LAD008086506-PC1 and any subsequent renewals of LAD008086506-PC1.

**HAZARDOUS
AND
SOLID
WASTE
AMENDMENTS**

VII.GENERAL CONDITIONS PURSUANT TO THE HAZARDOUS AND SOLID WASTE AMENDMENTS

VII.A. STANDARD CONDITIONS

VII.A.1. Waste Minimization

Annually, by March 1, for the previous year ending December 31, the Permittee shall enter into the operating record as required by LAC 33:V.1529.B.19, a statement certified according to LAC 33:V.513.A specifying that the Permittee has a program in place to reduce the volume and toxicity of hazardous wastes generated by the facility's operation to the degree determined by the Permittee to be economically practicable; and the proposed method of treatment, storage, or practicable disposal method that is currently available to the Permittee which minimizes the present and future threat to human health and the environment. A current description of the program shall be maintained in the operating record and a copy of the annual certified statement shall be submitted to the Administrative Authority. The following criteria should be considered for the program:

VII.A.1.a. Any written policy or statement that outlines goals, objectives, and/or methods for source reduction and recycling of hazardous waste at the facility;

VII.A.1.b. Any employee training or incentive programs designed to identify and implement source reduction and recycling opportunities;

VII.A.1.c. An itemized list of the dollar amounts of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste;

VII.A.1.d. Factors that have prevented implementation of source reduction and/or recycling;

VII.A.1.e. Sources of information on source reduction and/or recycling received at the facility (e.g., local government, trade associations, suppliers, etc.);

VII.A.1.f. An investigation of additional waste minimization efforts that could be implemented at the facility. This investigation would analyze the potential for reducing the quantity and toxicity of each waste stream through production reformulation, recycling, and all other appropriate means. The analysis would include an assessment of the technical feasibility, cost, and potential waste reduction for each option;

VII.A.1.g. A flow chart or matrix detailing all hazardous wastes the facility produces by quantity, type, and building/area;

VII.A.1.h. A demonstration of the need to use those processes that produce a particular hazardous waste due to a lack of alternative processes or available technology that would produce less hazardous waste;

VII.A.1.i. A description of the waste minimization methodology employed for each related process at the facility. The description should show whether source reduction or recycling is being employed;

VII.A.1.j. A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years; and

VII.A.1.k. The Permittee may meet the requirements for waste minimization by developing an Environmental Management System according to the EPA document, Integrated Environmental Management System Implementation Guide, EPA 744-R-00-011, October 2000, found on www.epa.gov/opptintr/dfe/pubs/iems/iems_guide/index.htm.

VII.A.2. Dust Suppression

Pursuant to LAC 33:V.4139.B.4, and the Toxic Substances Control Act, the Permittee shall not use waste or used oil or any other material which is contaminated with dioxin, polychlorinated biphenyls (PCBs), or any other hazardous waste (other than a waste identified solely on the basis of ignitability), for dust suppression or road treatment.

VII.A.3. Failure to Disclose

The Permittee's failure in the application or during the permit issuance process to disclose fully all relevant facts at any time may be cause for termination or modification of this Permit in accordance with LAC 33:323.B.2 and 3.

VII.A.4. Suspension, Modification, or Revocation and Reissuance, and Termination of Permit

This Permit may be modified, revoked and reissued, or terminated for cause as specified in LAC 33:V.323. The filing of a request by the Permittee for a permit modification, revocation and reissuance, termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any permit condition.

VII.A.4.a. If the Administrative Authority tentatively decides to modify or revoke and reissue a permit under LAC 33:V.321.C. or 323, a draft permit shall

be prepared incorporating the proposed changes. The Administrative Authority may request additional information and, in the case of a modified permit, may require the submission of an updated permit application.

VII.A.4.b. The Permittee may initiate permit modification proceedings under LAC 33:V.321.C. All applicable requirements and procedures as specified in LAC 33:V.321.C shall be followed.

VII.A.4.c. Modifications of this Permit do not constitute a reissuance of the Permit.

VII.A.5. Permit Review

This Permit may be reviewed by the Administrative Authority five years after the date of permit issuance and may be modified as necessary as provided for in LAC 33:V.323.B.2. Nothing in this section shall preclude the Administrative Authority from reviewing and modifying the Permit at any time during its term.

VII.A.6. Compliance with Permit

Compliance with a RCRA permit during its term constitutes compliance, for purposes of enforcement, with subtitle C of RCRA except for those requirements not included in the permit which:

VII.A.6.a. Become effective by statute;

VII.A.6.b. Are promulgated under LAC 33:V.Chapter 22 restricting the placement of hazardous wastes in or on the land; or

VII.A.6.c. Are promulgated under LAC 33:V.Chapters 23, 25 and 29 regarding leak detection systems for new and replacement surface impoundment, waste pile, and landfill units, and lateral expansions of surface impoundment, waste pile, and landfill units. The leak detection system requirements include double liners, construction quality assurance (CQA) programs, monitoring action leakage rates, and response action plans, and will be implemented through the procedures of LAC 33:V.321.C Class 1 permit modifications.

VII.A.7. Specific Waste Ban

VII.A.7.a. The Permittee shall not place in any land disposal unit the wastes specified in LAC 33:V. Chapter 22 after the effective date of the prohibition unless the Administrative Authority has established disposal or treatment

standards for the hazardous waste and the Permittee meets such standards and other applicable conditions of this Permit.

VII.A.7.b. The Permittee may store wastes restricted under LAC 33:V.Chapter 22 solely for the purpose of accumulating quantities necessary to facilitate proper recovery, treatment, or disposal provided that it meets the requirements of LAC 33:V.2205 including, but not limited to, clearly marking each tank or container.

VII.A.7.c. The Permittee is required to comply with all applicable requirements of LAC 33:V.2245 as amended. Changes to the Waste Analysis Plan will be considered permit modifications at the request of the Permittee, pursuant to LAC 33:V.321.C.

VII.A.7.d. The Permittee shall review the waste analysis plan and analyze the waste when a process changes to determine whether the waste meets applicable treatment standards. Results shall be maintained in the operating record pursuant to LAC 33:V.1529.B.6 and in accordance with Conditions III.C.3 and 4.

VII.A.8. Information Submittal for the Corrective Action Strategy

(RESERVED)

VII.A.9. Data Retention

(RESERVED)

VII.A.10. Management of Wastes

(RESERVED)

VII.B. EMISSION STANDARDS - PROCESS VENTS, EQUIPMENT LEAKS, TANKS, SURFACE IMPOUNDMENTS, AND CONTAINERS (AA-BB-CC AIR REGULATIONS)

VII.B.1. PERFORMANCE STANDARDS FOR EQUIPMENT LEAKS

(RESERVED)

VII.B.2. STANDARDS FOR TANKS AND CONTAINERS

The Permittee complies with LAC 33:V.1759, for the emission control for containers and shall comply with all applicable regulations. All tanks used for hazardous waste storage

are regulated by the provisions listed in the Hazardous Organics NESHAP (HON) and are not subject to regulation under LAC 33:V.Chapter 17.

VII.B.2.a. Operating Requirements

VII.B.2.a(1) The Permittee shall install and maintain all regulated units and associated emission control technology in accordance with the detailed plans, schedules, information, and reports as contained in the Part B Permit Application.

VII.B.2.a(2) The Permittee shall, upon request, identify all less than 90-day accumulation tanks or containers, which contain or contact hazardous wastes with organic concentrations equal to or greater than 10 percent by weight and identify the emission control system requirements under LAC 33:V.1703 to 1715.

VII.B.2.b. Monitoring Requirements

VII.B.2.b(1) The pollution control methods used for containers shall be inspected on a periodic basis.

VII.B.2.b(2) Level 1 controls shall be inspected in accordance with LAC 33:V.1759.C.4.

VII.B.2.c. Recordkeeping Requirements

Air emission control design documentation shall be maintained in the facility operating record until the equipment is no longer in service. Records must be prepared and maintained for the various equipment and systems used at the facility.

VII.B.2.c(1) Facilities that are governed by this Chapter and use alternate control systems meeting the emission control standards of 40 CFR 60, Subpart VV or 40 CFR 61, Subpart V must meet LAC 33:V.1765.H requirements.

VII.B.2.c(2) All tanks or containers not using air emission controls in accordance with LAC 33:V.1747.D must meet LAC 33:V.1765.I requirements.

VII.B.2.d. Reporting Requirements

VII.B.2.d(1) For each tank, surface impoundment, or container which manages hazardous waste that is exempted from using air emission

controls, a written report shall be submitted to the Administrative Authority within fifteen (15) days of each occurrence when hazardous waste is placed in the waste management unit in noncompliance with the conditions of LAC 33:V.1751.C, as applicable. The written report shall contain the EPA identification number, facility name and address, a description of the noncompliance event and the cause, the dates of the noncompliance, and the actions taken to correct the noncompliance and prevent reoccurrence of the noncompliance.

VII.B.2.d(2) For control devices used in accordance with the requirements of LAC 33:V.1735, a semiannual written report shall be submitted to the Administrative Authority, based on the date of submittal of the annual report, except as provided for in noncompliance situations. The report shall describe each occurrence during the previous six (6)-month period when a control device is operated continuously for twenty-four (24) hours or longer in noncompliance with the applicable operating values defined in LAC 33:V.1713.C.4 or when a flare is operated with visible emissions as defined in LAC 33:V.1707.D. The written report shall include the EPA identification number, facility name and address, an explanation why the control device could not be returned to compliance within 24 hours, and actions taken to correct the noncompliance.

VII.B.2.d(3) The report to the Administrative Authority in accordance with the requirements of VII.B.2.d.1. above is not required for a six (6)-month period during which all control devices subject to LAC 33:V, Subchapter C are operated such that during no period of twenty-four (24) hour or longer did control devices operate continuously in noncompliance with the applicable operating values defined in LAC 33:V.1713.C.4 or a flare operate with visible emissions as defined in LAC 33:V.1707.D.

VII.B.2.d(4) All reports shall be signed and dated by an authorized representative of the Permittee as per LAC 33:V.507.

TABLE VII.B.1

EMISSION CONTROLS FOR CONTAINERS/CONTAINER STORAGE AREAS

Container Storage Area Identification	LAC Reference(s)	Air Emission Controls	Visual Inspection
RCRA 1	LAC 33:V.1759.C-D	Level 1	Initially and Annually
RCRA 2	LAC 33:V.1759.C-D	Level 1	Initially and Annually
Mercury Recovery Unit	LAC 33:V.1759.C-D	Level 1	Initially and Annually
Mercury Drum Storage Area	LAC 33:V.1759.C-D	Level 1	Initially and Annually

VII.C. SPECIFIC CONDITION - CLOSURE

Pursuant to Section 3005(j)(1) of the Hazardous and Solid Waste Amendments of 1984, the Permittee shall close any closing units in accordance with the following provisions:

VII.C.1. Other than consolidation of any wastes from the sites in conformance with LAC 33:V.Chapter 22, Land Disposal Restrictions, the Permittee shall not place waste prohibited by LAC 33:V.Chapter 22 into any closing units;

VII.C.2. The Permittee shall perform unit closures in accordance with the Closure Plan(s) as approved at the time of closure, and which meet(s) all relevant State and Federal closure requirements at the time of closure; and

VII.C.3. The Permittee shall notify the Administrative Authority in writing at least 60 days prior to commencement of closure.

VIII. SPECIAL CONDITIONS PURSUANT TO HAZARDOUS AND SOLID WASTE AMENDMENTS

Section 3004(u) of RCRA, as amended by the Hazardous and Solid Waste Amendments (HSWA), and LAC 33:V.3322 require that permits issued after November 8, 1984, address corrective action for releases of hazardous waste or hazardous constituents from any solid waste management unit (SWMU) at the facility, regardless of when the waste was placed in the unit.

Each hazardous waste treatment, storage and disposal facility must address corrective action on a site-wide basis in the facility's RCRA permit. The permit must address provisions for investigation, and assessment and selection of final remedies for all releases and potential SWMUs at facilities subject to the provisions of LAC 33:V.3322. However, since a single facility or site may possess multiple RCRA permits, the specific HSWA corrective action provisions will not be contained in this document. All corrective action requirements for the PPG Westlake facility required under LAC 33:V.3322 are addressed under Permit No. LAD008086506-PC1, not this permit.

ATTACHMENT 1

ATTACHMENT 1
LIST OF FACILITY DOCUMENTS INCORPORATED
IN THE PERMIT BY REFERENCE
LAD008086506
AI#1255

DOCUMENT TYPE	APPLICATION /DOCUMENT DATE	ELECTRONIC DATABASE MANAGEMENT SYSTEM (EDMS) DOCUMENT ID	COMMENTS
Arrangement with local authorities	7/14/2008	37123853	Permit Application, Volume 4, Attachment 7, Page 76 of the EDMS Document
Closure cost estimates	6/10/2008	36997557	Update of Response to Notice of Deficiencies (2), Entire EDMS Document
Closure Plan	6/10/2008	36997557	Update of Response to Notice of Deficiencies (2), Entire EDMS Document
Contingency Plan	7/14/2008	37123853	Permit Application, Volume 4, Attachment 7, Page 76 of the EDMS Document
Inspection Plan	7/14/2008	37123853	Permit Application, Volume 4, Attachment 5, Page 61 of the EDMS Document
Security Plan	2/09/2005	32643318	Permit Application Volume 1, Chapter 15, page 160 of the EDMS Document
Personnel Training	7/14/2008	37123853	Permit Application, Volume 4, Attachment 6, Page 73 of the EDMS Document
Waste Analysis Plan	7/14/2008	37123853	Permit Application, Volume 4, Attachment 2, Page 25 of the EDMS Document
Operating Records	2/09/2008	32643318	Permit Application Volume 1, Chapter 15, page 182 of the EDMS Document

RESPONSIVENESS SUMMARY

**RESPONSIVENESS SUMMARY
PPG INDUSTRIES, INC, WESTLAKE FACILITY**

**HAZARDOUS WASTE OPERATING PERMIT
PERMIT NUMBER LAD008086506-OP-RN-1
AGENCY INTEREST #1255**

ITEM	1
REFERENCE	Public Hearing, Request for Final Decision, Tuesday, September 4, 2008.
ISSUE	Comments from Mr. Michael Tritico and Mr. Harold Arenó.
COMMENT	Is PPG Industries meeting the continuous emissions monitoring requirements? Is the continuous emissions monitoring system on all the time?
LDEQ RESPONSE	The PPG hazardous waste combustion units are all subject to the EPA continuous emission monitoring (CEM) requirements of the Clean Air Act (40 CFR 63.Subpart EEE Appendix). These requirements replace the earlier requirements of the Louisiana hazardous waste regulations. Therefore this hazardous waste operating permit does not apply to the operational requirements for these units. However, the Clean Air Act regulations require continuous monitoring of carbon monoxide and oxygen levels from the exhaust stack at all times while hazardous waste is in the combustion chamber. PPG's continuous emission monitoring system was last inspected in October 2008, and PPG was found to be in compliance with all Clean Air Act operational requirements, except for one recordkeeping practice involving cumulative adjustment of the monitors.
ACTION	No action required.

RESPONSIVENESS SUMMARY
PPG INDUSTRIES, INC, WESTLAKE FACILITY

HAZARDOUS WASTE OPERATING PERMIT
PERMIT NUMBER LAD008086506-OP-RN-1
AGENCY INTEREST #1255

ITEM	2
REFERENCE	Public Hearing, Request for Final Decision, Tuesday, September 4, 2008.
ISSUE	Comments from Mr. Michael Tritico and Mr. Harold Arenó.
COMMENT	Mr. Tritico noted that December 16, 2004, PPG reported two upsets/malfunctions dealing with the combustion units in this draft permit. Mr. Tritico was concerned about details and follow-up by LDEQ and PPG on the incidents and the relevance of the incidents to this permitting action.
LDEQ RESPONSE	<p>PPG reported two incidents in their December 2, 2004 notification received by LDEQ on December 16, 2004. (Exhibit #1 from public hearing) In the incident on November 28, PPG reported that vent flow to the #2 incinerator was abnormally high due to a process upset in an upstream unit. According to PPG's records, the vent flow from the production unit consisted of gases (nitrogen, carbon dioxide, hydrogen chloride, and small quantities of chlorinated and non-chlorinated organic compounds) that are sent to the incinerators for destruction. Normal procedure in the case of an abnormally high flow called for re-routing of some of the vents to the #3 halogen acid furnace (HAF) for destruction. However, the #3 HAF unit was shut down that day for maintenance. PPG responded by stopping the feed of hazardous waste (i.e. liquid) to the #2 incinerator during this event. No releases to the environment were reported.</p> <p>In the incident on November 29, 2004, the combustion airflow to the #1 incinerator dropped, causing the carbon monoxide reading in the reading to exceed 100 parts per million on an hourly rolling average. In response, PPG's control system initiated an automatic hazardous waste feed cutoff, which lasted until the airflow problem was corrected, and the carbon monoxide emissions returned to the acceptable range. Vents continued to be burned in the incinerator during this time. No releases to the environment were reported.</p> <p>The conditions and controls contained in this final permit including automatic hazardous waste feed cutoff are designed to prevent the releases to the environment beyond the regulated limits. These</p>

RESPONSIVENESS SUMMARY
PPG INDUSTRIES, INC, WESTLAKE FACILITY

HAZARDOUS WASTE OPERATING PERMIT
PERMIT NUMBER LAD008086506-OP-RN-1
AGENCY INTEREST #1255

conditions and controls are based on trial burns and the permit application. Also, it should be noted that the conditions and controls in this permit will be phased out in favor of the Phase I and II MACT (Maximum Achievable Control Technology).

ACTION

No action required.

**RESPONSIVENESS SUMMARY
PPG INDUSTRIES, INC, WESTLAKE FACILITY**

**HAZARDOUS WASTE OPERATING PERMIT
PERMIT NUMBER LAD008086506-OP-RN-1
AGENCY INTEREST #1255**

ITEM	3
REFERENCE	Public Hearing, Request for Final Decision, Tuesday, September 4, 2008.
ISSUE	Comments from Mr. Michael Tritico and Mr. Harold Arenó.
COMMENT	Is a +/- 50% bias an acceptable value for a successful VOST audit?
LDEQ RESPONSE	The VOST audit is performed by introducing a cylinder gas prepared by EPA into the sampling train. The gas contains the principal organic hazardous constituent of the waste being burned, in an exact concentration known only to EPA. The samples obtained by this process are sent to PPG's contract laboratory for analysis. The +/- 50% bias is the standard criterion used by EPA to judge the success or failure of the audit. EPA Region 6 determined that PPG passed the September 20, 2004 audit (Exhibit #2 from public hearing).
ACTION	No action required.

**RESPONSIVENESS SUMMARY
PPG INDUSTRIES, INC, WESTLAKE FACILITY**

**HAZARDOUS WASTE OPERATING PERMIT
PERMIT NUMBER LAD008086506-OP-RN-1
AGENCY INTEREST #1255**

ITEM	4
REFERENCE	Public Hearing, Request for Final Decision, Tuesday, September 4, 2008.
ISSUE	Comments from Mr. Michael Tritico and Mr. Harold Arenó.
COMMENT	Mr. Tritico asked for clarification of the trial burn history for the PPG Industries, Westlake Facility. "I remember years ago the volatile organic sampling train failed and yet there was a declaration that the trial burn was a success."
LDEQ RESPONSE	<p>The commenter may be referring to the trial burn of June 2001 on the #1 and #2 incinerators. During that trial burn, PPG failed the VOST audit. This trial burn was not declared a success; by letter of February 6, 2003, the EPA and LDEQ determined that it was inconclusive, and that a new trial burn was necessary. The new, more stringent Maximum Achievable Control Technology (MACT) standards went into effect on September 30, 2003, and in September 2004, PPG performed a new comprehensive performance test which satisfied these new standards in addition to the old. As explained in the response to Item #3, the VOST audit of September 2004 was passed. The operating limits for incinerators #1 and 2 have currently been placed in the Title V Clean Air Act permit (permit no. 2040-V1, expiration date 2/21/2010), as required by the MACT regulations.</p> <p>The operating limits for the #3 HAF unit in this permit are based on the Clean Air Act comprehensive performance test of April 2007. These limits will eventually be placed into the Title V permit.</p>
ACTION	No action required.

RESPONSIVENESS SUMMARY
PPG INDUSTRIES, INC, WESTLAKE FACILITY

HAZARDOUS WASTE OPERATING PERMIT
PERMIT NUMBER LAD008086506-OP-RN-1
AGENCY INTEREST #1255

ITEM	5
REFERENCE	Public Hearing, Request for Final Decision, Tuesday, September 4, 2008.
ISSUE	Comments from Mr. Michael Tritico and Mr. Harold Arenó.
COMMENT	A request was made for a Prevention of Significant Deterioration to be made for this facility and permit.
LDEQ RESPONSE	<p>LAC 33:V.515.A.14.d requires the applicant to list in the Part I application if they have a Prevention of Significant Deterioration (PSD) program under the Title V Air Permit.</p> <p>A records review indicates that a PSD program is not required from Permittee for the Title V Permit, 2040-V1.</p>
ACTION	No action required.

**RESPONSIVENESS SUMMARY
PPG INDUSTRIES, INC, WESTLAKE FACILITY**

**HAZARDOUS WASTE OPERATING PERMIT
PERMIT NUMBER LAD008086506-OP-RN-1
AGENCY INTEREST #1255**

ITEM	6
REFERENCE	Public Hearing, Request for Final Decision, Tuesday, September 4, 2008.
ISSUE	Comments from Mr. Michael Tritico and Mr. Harold Arenó.
COMMENTS	Mr. Tritico stated that there has not been a "sensible answer to the IT questions, particularly about storm surge vulnerability."
LDEQ RESPONSE	LDEQ acknowledges but does not concur with the comment. The Permittee described the hurricane preparedness procedures in the Contingency Plan submitted with the application. In addition, the Permittee described the effects from past hurricanes in the December 6, 2007, response to comment as required by LAC 33:V.517.T.4.b.iii.
ACTION	No action required.

**RESPONSIVENESS SUMMARY
PPG INDUSTRIES, INC, WESTLAKE FACILITY**

**HAZARDOUS WASTE OPERATING PERMIT
PERMIT NUMBER LAD008086506-OP-RN-1
AGENCY INTEREST #1255**

ITEM	7
REFERENCE	Public Hearing, Request for Final Decision, Tuesday, September 4, 2008.
ISSUE	Comments from Mr. Michael Tritico and Mr. Harold Arenó.
COMMENTS	Mr. Tritico noted that surrogate compound(s) were used during the trial burn and stated that the policy should be revised.
LDEQ RESPONSE	<p>All trial burns / comprehensive performance tests on incinerators #1 and #2 and HAF Unit #3 have been performed using actual hazardous waste, not surrogates prepared for the occasion. The units have to pass a destruction and removal efficiency (DRE) test of 99.99% or better on each principal organic hazardous constituent (POHC) in order to get a permit. The size of the organic molecules being destroyed does not necessarily indicate that they are easy or difficult to destroy by incineration. The POHCs are chosen for each test based on being the most difficult to burn compounds listed on the EPA thermal stability-based incinerability index, which is solely based on actual test data.</p> <p>The POHCs chosen for all three combustion units at PPG were chlorobenzene and tetrachloroethene. Chlorobenzene is a Class 1 compound on the index, meaning hardest to burn, and tetrachloroethene is a Class 2 compound. Since the test showed adequate destruction of these two compounds, any other organic compound produced by PPG should be destroyed also.</p>
ACTION	No action required.

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PPG INDUSTRIES, INC, WESTLAKE FACILITY

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ITEM	8
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Signature Page and Draft Permit, Section II.A.; Signature Page, Page 2 and Draft Permit Page 5
COMMENTS	<p>The first paragraph on page 2 of the Signature page indicates a blank for the effective date. Further, Section II.A. indicates that the permit is effective as of the date indicated on the signature page. PPG requests when the permit is issued, that LDEQ specifically provide that the permit renewal becomes effective on January 1, 2009. Many requirements of the permit affect annual requirements. Having the permit term begin on January 1, 2009, will avoid any issue about whether annual requirements are a calendar year or whether they run from the issuance date or the date that PPG may be served with the final permit decision. Further, there are some new requirements imposed under this permit that PPG needs time to adjust to for recordkeeping and reporting purposes. Making the permit effective on January 1, 2009, will allow PPG time to implement such new procedures. La. R.S. 30:2024 indicates that a permit is effective upon issuance unless a later date is specified therein. Thus, it is clear that LDEQ has the authority to allow a later date.</p>
LDEQ RESPONSE	<p>LDEQ concurs with the comment. A thirty day appeal period is required before the final permit can be made effective; however, the effective date may be set at any reasonable time after the thirty day appeal period.</p>
ACTION	<p>LDEQ anticipates that the final permit will be issued before or by December 31, 2008 and that January 30, 2009 will be the effective date on the signature page of the final permit.</p>

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PPG INDUSTRIES, INC, WESTLAKE FACILITY

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ITEM	9
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Glossary of Terms, Draft Permit p. 3
COMMENTS	PPG requests that LDEQ revise the definition of "Facility" to be exactly the same as the definition in LAC 33:V.109, or in the alternative, to omit this definition because the first paragraph of the glossary already indicates that unless otherwise provided terms used in the permit have the same meaning as found in LAC 33:V.Chapter 1. The definition of facility in the draft permit is incomplete and does not reflect the whole definition that is already provided in the rules. The definition in the rules should control.
LDEQ RESPONSE	LDEQ acknowledges the comment. There are definitions for facility under LAC 33:V.109. The definition in the draft permit is a paraphrase of the second definition of facility from LAC 33:V.109, and as such is more appropriate for the HSWA requirements under LAC 33:V.3322.
ACTION	The definition of "facility" has been removed from the Glossary of Terms of the permit, page 2.

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ITEM	10
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Glossary of Terms, Draft Permit p. 2
COMMENTS	PPG requests that LDEQ revise the definition of Area of Investigation to be exactly the same as in the RECAP document and that a citation to the RECAP document be provided.
LDEQ RESPONSE	LDEQ acknowledges the comment. The definition referred to in this comment are linked to their use in the current HSWA boilerplate. This permit addresses RCRA operating units at the Permittee's facility. HSWA corrective action is and will be addressed in the facility's post-closure permit renewal. Definitions relevant to site-wide corrective action under the HSWA requirement are not necessary for this permit.
ACTION	The definitions of Area of Investigation and Area of Concern have been removed from the Glossary of Terms, page 2 of the draft permit.

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ITEM	11
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Glossary of Terms, Draft Permit p. 2
COMMENTS	PPG requests that the term "Beneficial Resource" be deleted. There is nothing in the state hazardous waste rules that establishes legal authority for this definition. LDEQ must follow an appropriate rulemaking process under the Louisiana Administrative Procedures Act to define "beneficial resources" and to establish a procedure for granting special protection to such resources. Currently, no appropriate rulemaking processes has established such term or procedure, so it is not appropriate to include such term in this permit.
LDEQ RESPONSE	LDEQ concurs with the comment. The term "Beneficial Resource" is not defined in the hazardous waste regulations nor is the term defined in Subtitle II of Title 30 of the Louisiana Revised Statutes. In addition, the term is not included in any other portion of the permit.
ACTION	The term "Beneficial Resource" has been removed from the Glossary of Terms, page 2 of the draft permit.

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PPG INDUSTRIES, INC, WESTLAKE FACILITY**

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ITEM	12
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Glossary of Terms, Draft Permit p. 2
COMMENTS	PPG requests that the terms "Constituent of Concern", "Constituents of Potential Concern", and "Conceptual Site Model" be revised to be exactly the same as in the RECAP document and that appropriate citations to the RECAP document be provided.
LDEQ RESPONSE	LDEQ acknowledges the comment. The definitions referred to in this comment are linked to their use in the current HSWA boilerplate. This permit addresses RCRA operating units at the Permittee's facility. HSWA corrective action is and will be addressed in the facility's post-closure permit renewal.
ACTION	The definitions for "Constituent of Concern", "Constituents of Potential Concern", and "Conceptual Site Model" have been removed from the Glossary of Terms, Draft Permit page 2 of the draft permit.

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PPG INDUSTRIES, INC, WESTLAKE FACILITY

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ITEM	13
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Glossary of Terms, Draft Permit p. 3
COMMENTS	PPG requests that LDEQ revise the definition of "Hazardous Constituent" by changing the term to "Hazardous Waste Constituent" and by inserting "of a hazardous waste" after the word "constituent" in both places where the word constituent exists. See also definition of "Constituent" in LAC 33:V.109.
LDEQ RESPONSE	<p>LDEQ concurs with the comment. The definition of constituent or hazardous waste constituent is "any substance specified as a hazardous waste in any <i>list</i> in these rules and regulations" (emphasis added).</p> <p>However, LDEQ points out that the term "hazardous constituent" is used in the regulations. Examples of the use of the term include LAC 33:V.322.B.1.c and LAC 33:V.3307. For the most part, the term seems to be synonymous with hazardous waste constituent as defined in LAC 33:V.109.</p>
ACTION	The definition for "Hazardous Constituent" has been removed from the Glossary of Terms, page 3. The following definition was added to the Glossary of Terms, page 2 of the final permit: " <i>Hazardous Waste Constituent is any substance specified as a hazardous waste in any list in these rules and regulations (LAC 33:V. Hazardous Waste, Subpart 1).</i> "

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ITEM	14
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Glossary of Terms, Draft Permit p. 3
COMMENTS	PPG requests that LDEQ revise the definition of "Newly Discovered Release" by changing the term "hazardous constituent" to "hazardous waste constituent."
LDEQ RESPONSE	LDEQ acknowledges and concurs with this comment. Refer to Item 13 for a more detailed discussion.
ACTION	The definition of "Newly Discovered Release" in the Glossary of Terms, page 2 of the final permit, has been edited as follows: <i>"any release(s) of hazardous waste, including hazardous <u>waste</u> constituents, in which there is a statistically significant increase over the background data for the media of concern, during the course of groundwater monitoring, field investigation, environmental auditing, or by other means"</i> .

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ITEM	15
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Glossary of Terms, Draft Permit p. 4
COMMENTS	PPG requests that LDEQ delete the second to last paragraph on this page. If a term defined in this permit is revised through rulemaking after the issuance of this permit, it is not legally appropriate to apply the new definitions to the permit without going through the permit reopener process provided in the rules. Either LDEQ or PPG can request a permit reopener in such case.
LDEQ RESPONSE	LDEQ acknowledges and concurs with the comment. Once issued any change in a permit would require a permit modification. Such changes include even typographical errors. Changing the wording of a definition would require a permit modification under LAC 33:V.322.A.1.
ACTION	The paragraph " <i>If, subsequent to the issuance of this Permit, regulations are promulgated which redefine any of the above terms, the Administrative Authority may, at its discretion, apply the new definition to this Permit.</i> " has been removed from the Glossary of Terms of the final permit.

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ITEM	16
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition II.C., p. 5
COMMENTS	In the first paragraph, PPG requests that LDEQ change the term "inaccuracies" to "material inaccuracies" in both places that term appears. PPG also requests that the LDEQ insert "material" before the word "deviation" and before the word "changes".
LDEQ RESPONSE	LDEQ acknowledges but does not concur with the comment. Any inaccuracies discovered in the application must be assessed on a case-by-case basis to determine if revocation or modification of the permit is warranted. If an inaccuracy in the permit leads the administrative to determine that some condition or conditions in the permit no longer meet the regulatory requirements, then a permit modification would be required.
ACTION	No action required.

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ITEM	17
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition II.C., p. 5
COMMENTS	In the second paragraph, second sentence, PPG requests that LDEQ change the term "modify" to "reopen and modify" to more appropriately reflect the requirements of the existing rules.
LDEQ RESPONSE	LDEQ acknowledges and concurs. The regulatory language in LAC 33:V.323.B.2, does refer to the term "reopen" in that whole or varied parts of a permit may be reopened and modified.
ACTION	The second sentence, second paragraph of Condition II.C, page 4 of the final permit, has been edited as follows: <i>"The Administrative Authority may modify <u>and reopen</u> the permit when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations or by judicial decision after the permit was issued."</i>

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ITEM	18
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Conditions II.E.16, II.E.17, and II.E.18, p.10 and 11
COMMENTS	In the first line in each of these subsections, please add "of hazardous waste" after the term "unauthorized discharge."
LDEQ RESPONSE	LDEQ acknowledges and concurs with the comment. The RCRA Hazardous Waste Permit applies to the management of hazardous waste and not hazardous materials.
ACTION	In Conditions II.E.16, 17, and 18, the term " <i>unauthorized discharge</i> " has been replaced with the term " <i>unauthorized discharge of hazardous waste</i> ".

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ITEM	19
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit Condition II.E.22, p. 12
COMMENTS	PPG requests that this subsection be deleted as there is no statutory basis for this requirement. Further, it is vague and ambiguous. In addition, it references monitoring reports, but this permit does not require the submittal of monitoring reports, so it is not clear when such information would be reported in any case. PPG believes that the reporting requirements in the prior sub-sections are sufficient to provide the Department with information needed.
LDEQ RESPONSE	LDEQ acknowledges but does not concur. The regulation LAC 33:V.309.L.11 corresponds to this condition. However, the language in Condition II.E.22 does not completely comport with the language in LAC 33:V.309.L.11. The language in this permit condition will be revised.
ACTION	Condition II.E.22., has been edited as follows: <i>"The Permittee shall report all instances of noncompliance not otherwise required to be reported above <u>not reported under Conditions II.E.11, II.E.13, II.E.15, and II.E.20</u>, at the time required monitoring reports are submitted. The reports shall contain the information listed in Conditions <u>II.E.11 and II.E.20.</u>"</i>

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ITEM	20
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition II.E.25.a, p. 12
COMMENTS	This section indicates that PPG must submit information to LDEQ within 45 days of the effective date of the permit showing how minimum tank thicknesses contained in Table 4 were derived. Some of the information on minimum tank thickness in this Table is erroneous. As discussed with the Department, an updated Table 4 with information on minimum tank thickness and the derivation of such information will be provided within the 45 day period.
LDEQ RESPONSE	LDEQ will review the updated information when it is submitted. If the information is unsatisfactory or incomplete, LDEQ may require additional information. LDEQ may also require a permit modification to implement the new tank thicknesses.
ACTION	No action required.

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ITEM	21
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition II.E.25.b, p.12
COMMENTS	A revised contingency plan will be submitted within 45 days after the effective date of this permit.
LDEQ RESPONSE	<p>LDEQ acknowledges the comment. Please note the LDEQ response to Item 42. Because of the timing and nature of the response in the Permittee's July 14, 2008 final response to comment, the LDEQ concurs with the Permittee's comment in Item 42. Thus, LDEQ accepts the revised contingency plan contained in the July 14, 2008 response to comments.</p> <p>As such the requirement to submit a revised contingency plan in the schedule of compliance is not necessary.</p>
ACTION	Permit condition II.E.25.b of the draft permit has been deleted from the final permit. See changes to permit per Item 42 regarding Attachment 1.

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ITEM	22
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition II.E.33, p. 14
COMMENTS	<p>PPG requests that LDEQ revise the second sentence to read as follows in order to better reflect the legal regulatory requirements (note that not all hazardous waste facilities require permits because some are exempt by statute or rule):</p> <p><i>If the Permittee determines that an unpermitted hazardous waste TSD facility exists that does not have a permit when a permit is required, the Permittee must immediately notify the Administrative Authority in accordance with Condition II.E.22 of the General Permit Conditions.</i></p>
LDEQ RESPONSE	LDEQ acknowledges and concurs with the comment that not all hazardous waste facilities require permits.
ACTION	<p>The second sentence of Condition II.E.33 has been edited as follows: "<i>If the Permittee determines that an unpermitted hazardous waste <u>TSD</u> facility exists <u>that does not have a permit when a permit is required</u>, the Permittee must immediately notify the Administrative Authority in accordance with Condition II.E.22 of the General Permit Conditions.</i>"</p>

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ITEM	23
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition II.E.34, p. 15
COMMENTS	PPG requests that LDEQ delete the reference to the HSWA portion of the permit as the HSWA permit is part of the WTU surge pond post-closure permit, not this permit.
LDEQ RESPONSE	LDEQ acknowledges but does not entirely concur with the comment. There are requirements in Section VII of the permit. For instance, Condition VII.C. had relevance to Condition II.E.34. The reference to Section VIII of this permit will be removed.
ACTION	Condition II.E.34 has been edited as follows, " <i>The Permittee shall comply with those land disposal restrictions set forth in LA. R.S. 30:2193, all regulations promulgated thereunder, and the HSWA portion of this permit</i> (Conditions VII and VIII) <u>Condition VII of this permit.</u> "

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ITEM	24
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition II.E.35, p. 15
COMMENTS	PPG requests that this section either be deleted or rewritten by adding the following note at the end of the condition: <i>(Note: All groundwater monitoring requirements for the PPG Westlake facility are addressed under Permit No. LAD008086506-PC1, not this permit).</i>
LDEQ RESPONSE	LDEQ acknowledges and concurs with the comment as groundwater monitoring requirements will be addressed under the Permit LAD008086506-PC-RN-1.
ACTION	Condition II.E.35 has been revised to include the following sentence, " <i>All groundwater monitoring requirements for the PPG Westlake facility are addressed under Permit No. LAD008086506-PC-RN-1, not this permit.</i> "

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ITEM	25
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition II.E.36, p.15
COMMENTS	<p>PPG requests that this section be rewritten by revising the last sentence to read as follows:</p> <p><i>Facility-wide corrective action requirements have been specified in the HSWA section of the facility's post-closure permit for the WTU Surge Pond Permit No. LAD008086506-PC1, not this permit.</i></p>
LDEQ RESPONSE ACTION	<p>LDEQ acknowledges and concurs with the comment.</p> <p>The last sentence of Condition II.E.36 has been deleted and replaced with the following language: <i>"Facility-wide corrective action requirements have been specified in the HSWA section of the facility's post-closure permit for the WTU Surge Pond Permit No. LAD008086506-PC1, not this permit."</i></p>

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ITEM	26
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition III.C.3, p. 16
COMMENTS	PPG requests an interpretation of what must be reported on the Annual Report regarding re-characterization of a hazardous waste that has "changed". Based on discussions with the Department, these should be substantive changes (e.g., listed waste codes, significant re-characterization, not just a "D" code or small change in chemical composition).
LDEQ RESPONSE	<p>LDEQ acknowledges the comment and concurs in part. The purpose of a waste analysis is to provide a characterization of the waste to ensure that the waste is properly treated, stored and/or disposed. If the Permittee has reason to believe that the waste has changed to such an extent that their ability to treat, store and/or dispose of the waste has been affected, then re-sampling and re-characterization of the waste stream would be required. As such not every change in a waste will require re-sampling and re-characterization.</p> <p>Major changes in the chemical composition or the addition of a listed waste code would require a re-characterization of the waste. However, minor changes in the chemical or physical composition or the addition of a D listed waste may or may not require re-characterization of the waste. For instance, the addition of a D-listed waste to a waste stream with the same characteristic is unlikely to affect the ability of the Permittee to manage the waste stream. However, the addition of a D-listed waste with a different characteristic might affect the ability of the Permittee to manage the waste.</p> <p>In short, the question is a performance based issue. The Permittee must re-characterize the waste whenever the Permittee determines that a change in the waste stream would require a change in the manner the waste is stored, treated or disposed.</p>
ACTION	No action taken.

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ITEM	27
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition III.K.5, p.18
COMMENTS	PPG requests that this provision be deleted as such arrangements are documented in the Contingency Plan. There should be no need to document such arrangements in the Annual Report. There does not appear to be a regulatory requirement to include such information in the annual report each year.
LDEQ RESPONSE	<p>LDEQ acknowledges the comment and concurs only in part. Documentation has been submitted that arrangements have been made with local authorities in accordance with LAC 33:V.1513.B.3. A determination that the Permittee is in compliance with the regulation was made during the permit application process.</p> <p>However, the Permittee must maintain the information onsite in the latest approved contingency plan. In addition, changes in the arrangements with local authorities must be submitted as a permit modification for the contingency plan. The Permittee must document any such changes in the annual report by reference to the latest approved contingency plan.</p>
ACTION	<p>The language of Condition III.K.5 has been deleted and replaced with the following language: <i>"The Permittee shall maintain documentation on site that the requirements of LAC 33:V.1511.G have been met. This documentation shall include those state and local agencies involved and those facilities and operations covered. Where state or local authorities decline to enter into such arrangements, the Permittee must document the refusal in the operating record."</i></p> <p><i>Any changes in the Arrangements with Local Authorities must be documented in the latest approved Contingency Plan and submitted to the administrative authority as a permit modification. The Permittee must document such changes in the annual report by reference to the latest approved Contingency Plan."</i></p>

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ITEM	28
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition IV.C., p.23
COMMENTS	PPG requests that the word "store" be changed to "treat" in the first sentence of the paragraph before Table 3.
LDEQ RESPONSE	LDEQ concurs with this comment. Table 3 on page 23 lists the permitted combustion units. The word "treat" rather than "store" properly describes the waste management at these permitted units.
ACTION	The first paragraph of Condition IV.C., has been edited as follows, " <i>The combustion units listed in Table 3 below are permitted to <u>treat</u> hazardous waste consistent with the conditions of this permit. Details of the existing combustion units listed in Table 3, including design and operational specifications, are contained in Permit Conditions V.B through V.D.</i> "

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ITEM	29
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Table 3, p. 23
COMMENTS	<p>PPG requests that the word "Chlor-Alkali" be changed to "Derivatives" every place it appears in the Location column. All of these units are located in the Derivatives area of the plant, not the Chlor-Alkali area.</p> <p>Further, PPG requests that the last column be deleted or revised and clarified. PPG does not know the purpose of this column, nor where this information came from. The column heading is "Process Design Capacity" in pounds per hours. We are uncertain as to whether this means feed rates for liquid feeds only or whether it also includes vent gases that are not hazardous wastes. If design capacity is an important issue, the data and units by which measured should match those in the facility's Title V permit.</p>
LDEQ RESPONSE	<p>LDEQ acknowledges and concurs with the comment. References to "Derivatives" shall be changed to "Chlor-Alkali" as appropriate.</p> <p>The information on Table 3, for "Process Design Capacity" originates from the Part A Application, Hazardous Waste Permit Information Form, Process Codes and Design Capacities. Under Process Design Capacity in this Part A Form, the Permittee lists the 12,000 pounds per hour for the Incinerators (process code T03) and 9,000 pounds per hour for the Halogen Acid Furnace (process code T92).</p> <p>However, the "Process Design Capacity" is not necessary in Table 3, page 23, to establish operating conditions for the units. However, if PPG believes the process design capacities listed in the Part A are inaccurate, then a Class 1 modification will be required to revise the information.</p>
ACTION	Table 3 has been revised to change the word "Chlor-Alkali" to "Derivatives" throughout. The last column of the table has been deleted.

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ITEM	30
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition V.A.1.b.(4)., p. 24
COMMENTS	PPG requests that this sub-section be deleted. There is no statutory or regulatory basis for this condition. Although PPG is not a commercial facility, PPG does receive hazardous waste from other PPG facilities for treatment on-site. This was indicated in the application. Without waiving the foregoing request, PPG also asserts that if there is any restriction for off-site wastes, there should be an emergency exception.
LDEQ RESPONSE	LDEQ partially concurs with this comment. The intention of V.A.1.b.(4) was to prohibit activities that would be associated with a commercial hazardous waste facility.
ACTION	Condition V.A.1.b.(4) has been edited as follows: " <i>The Permittee is prohibited from receiving any hazardous waste from offsite, other than that received from other facilities owned by PPG Industries, Inc that are approved in this permit. The Permittee may not receive, treat, store or dispose of hazardous waste for a fee or other consideration without modifying this permit to meet the requirements of LAC 33:V.Chapter 4.</i> "

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ITEM	31
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Table 4, p. 25
COMMENTS	PPG requests that this Table be revised as some of the information is erroneous. As noted above, PPG will submit a revised Table 4 within 45 days of the effective date of the permit.
LDEQ RESPONSE	LDEQ will review the updated information when it is submitted. If the information is unsatisfactory or incomplete, LDEQ may require additional information. LDEQ may also require a permit modification to implement the new tank thicknesses.
ACTION	No action required.

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ITEM	32
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition V.A.2.b., p. 26
COMMENTS	PPG requests that this sub-section be revised by adding "except as provided in LAC 33:V.322.F.4." at the end of the subsection. PPG further requests that LDEQ clarify in its response to comments that this prohibition applies only to permitted TSD facilities and does not apply to less than 90-day storage areas subject to LAC 33:V.1109.E.
LDEQ RESPONSE ACTION	LDEQ acknowledges and concurs with the comment. Condition V.A.2.b has been edited as follows: " <i>The Permittee is prohibited from storing hazardous waste that is not identified in the most current RCRA Subtitle C Site Identification Form (Part A Permit Application), <u>except as provided in LAC 33:V.322.F.4. This prohibition does not apply to storage units managed in accordance with LAC 33:V.1109.E.</u></i> "

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ITEM	33
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition V.A.6.e.(1), p. 29
COMMENTS	PPG requests that the requirement for biennial thickness testing be changed to a requirement for internal inspections once every 3 years. There is no specific regulatory standard for this requirement. PPG performs internal inspections every 3 years. These internal inspections are more rigorous and better serve the purpose of detecting problems than does a biennial thickness testing requirement.
LDEQ RESPONSE	LDEQ concurs that an internal inspection every 3 years is a more stringent and protective requirement than external thickness testing every 2 years.
ACTION	<p>The draft permit language of Condition V.A.6.e.(1) has been deleted and replaced with the following language: <i>"Thickness testing of each metallic tank covered by this permit shall be performed in conjunction with an internal inspection performed as required under Condition V.A.6.d of this permit, and according to the inspection standard given in Table 4."</i></p> <p>Condition V.A.6.d, first and second sentences of the first paragraph, have been deleted and replaced with the following: <i>"Internal inspection of each tank covered by this permit shall be performed every 3 years, unless a longer interval is authorized by the administrative authority."</i></p>

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ITEM	34
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition V.A.6.e.(6), p. 30
COMMENTS	PPG plans to average tank thickness measurements as allowed by the tank regulations in Table 4. This comment is considered by PPG as bringing it "to the attention of the Administrative Authority".
LDEQ RESPONSE	LDEQ does not concur with this comment. Conditions V.A.6.e.(5) and (6) were written to allow the permittee to use thickness averaging allowed by the applicable inspection codes, in cases where individual thickness readings fall below the minimum value specified in Table 4. LDEQ is allowing these procedures to be used, but only if LDEQ is notified at the time.
ACTION	No action necessary.

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ITEM	35
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition V.A.7., p. 31
COMMENTS	The phrase "leak and spill" in this section should be changed to "releases to the Environment" because the discussion clearly talks about proper disposal of any visible contamination of the soil or surface waste and the regulation generally refers to leaks from tank systems or secondary containment. Those are defined terms and should be used rather than the more generic terms leak and spill.
LDEQ RESPONSE	<p>"Leak or spill" is the phrase used in the applicable regulations (LAC 33:V.1913). The term "release to the environment" would not apply to every leak or spill that could occur, so it would not carry the same meaning as the original phrase.</p> <p>For instance the section does not only refer to contamination of soil. Condition V.A.7.b.(3), refers to material trapped in sumps and not yet released to the underlying soil.</p>
ACTION	No action taken.

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ITEM	36
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition V.A.8, p. 32
COMMENTS	The term "Comprehensive" should be changed to "Consolidated".
LDEQ RESPONSE ACTION	<p>LDEQ acknowledges and concurs with the comment.</p> <p>The second sentence of Condition V.A.8 has been edited as follows, "<i>The Permittee will comply with the air emission control equipment standards by complying with the provisions of its Comprehensive <u>Consolidated</u> Fugitive Emissions Monitoring Program implemented under the facility air permit(s).</i>"</p>

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ITEM	37
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition V.A.9.c.(4).c, p.33
COMMENTS	As noted above, PPG intends that tank thickness measurements will be averaged where appropriate.
LDEQ RESPONSE	LDEQ acknowledges and concurs with this comment. See the response to Item 34 for further discussion.
ACTION	No action is necessary.

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ITEM	38
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition V.C.3.b.2 and V.D.4.b.2, p. 38 and p. 39
COMMENTS	There is a typographical/grammatical error in both of these sub-sections. The word "is" should be changed to "are."
LDEQ RESPONSE ACTION	LDEQ concurs with this comment. The word "is" has been changed to "are" in Conditions V.C.3.b.2 and V.D.4.b.2.

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ITEM	39
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition V.D.5.a.10 and 11, p.41
COMMENTS	<p>These sections discuss the Continuous Emissions Monitoring System. This term is not defined in the permit. PPG requests clarification that the CEMS refers to the carbon monoxide monitoring system. Further, this section appears to require 100% on-stream time for the CEMS, which is unreasonable. Virtually every NESHAP and MACT standard has a data availability section that provides that 95% on-stream time in a calendar quarter is reflective of good performance of the CEMS. Further 100% on-stream time of the data logging historian also appears to be required. PPG requests that LDEQ require the same CEMS data availability that is required under the Combustor MACT (NESHAP Subsection EEE) rather than implying that 100% on-stream time for the system is required.</p>
LDEQ RESPONSE	<p>The term "Continuous Emission Monitoring System" is defined in RCRA under 40 CFR 266.Appendix IX.Section 2.0, which is incorporated into the Louisiana regulations by reference as LAC 33:V.3099.Appendix I. Under RCRA, the term refers only to carbon monoxide and oxygen monitoring.</p> <p>The permit does not require 100% availability of the monitors, as it specifically allows for "normal calibration periods" offline. Outside of normal calibration periods, the monitor and data historian must be functioning at all times while hazardous waste is being burned.</p> <p>It is anticipated that these conditions of the permit will be superseded by the requirements of the 40 CFR 63.Subpart EEE.Appendix, once the facility's Title V permits are modified to incorporate to include those requirements.</p>
ACTION	The definition of Continuous Emission Monitoring System from 40 CFR 266.Appendix IX.Section 2.0 has been added to the Glossary of Terms as

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follows:

“Continuous Emission Monitoring System (CEMS)” A continuous monitor is one in which the sample to be analyzed passes the measurement section of the analyzer without interruption, and which evaluates the detector response to the sample at least once every 15 seconds and computes and records the results at least every 60 seconds. A CEMS consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, the analyzer(s), and the data recording/processing hardware and software.

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ITEM	40
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition VI.B., p. 43
COMMENTS	PPG requests that LDEQ either delete this section, or add a note to the permit itself that indicates that any corrective action for groundwater contamination is/will be addressed per the Post-Closure Permit for the WTU Surge Pond/HSWA Permit.
LDEQ RESPONSE	LDEQ acknowledges and concurs with the comment. The post-closure permit, LAD008086506-PC1, currently addresses all corrective action requirements for releases to groundwater under LAC 33:V.3321 and LAC 33:V.3322.
ACTION	Condition VI.B was edited as follows: <i>"If ground water contamination is confirmed as a result of operations related to past or present hazardous waste management units, the Permittee shall establish, expand, or continue assessment and corrective action programs in accordance with the requirements of LAC 33:V.Chapter 3321 and as subsequently directed by the Administrative Authority <u>in the facility's current post-closure permit, LAD008086506-PC1 and any subsequent renewals of LAD008086506-PC1.</u>"</i>

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ITEM	41
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Condition VIII, p. 50
COMMENTS	<p>PPG requests that LDEQ rewrite the last sentence of this section to read as follows:</p> <p><i>All corrective action requirements for the PPG Westlake facility required under LAC 33:V.3322 are addressed under Permit No. LAD008086506-PC1, not this permit.</i></p>
LDEQ RESPONSE	<p>LDEQ acknowledges and concurs with the comment. On 12/29/2006, a Class 2 modification of the post-closure became effective. The modification incorporated the requirements of the then active HSWA permit into the post-closure permit, LAD008086506-PC1. The HSWA requirements are currently addressed in the facility post-closure permit and will be addressed in the renewal of that permit.</p>
ACTION	<p>The sentence, "<i>Rather corrective action requirements will be addressed in the facility's post-closure permit.</i>", has been deleted from the Condition VIII, page 50. The sentence, "<i>All corrective action requirements for the PPG Westlake facility required under LAC 33:V.3322 are addressed under Permit No. LAD008086506-PC1, not this permit.</i>", was added as the last sentence of Condition VIII.</p>

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ITEM	42
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Attachment 1
COMMENTS	<p>Attachment 1 – this Attachment lists the various plans and documents incorporated into the permit by reference. A number of the references to the Application/Document Date are incorrect as PPG provided updated plans and documents during the course of the permit review. PPG requests that LDEQ revise the information in the column “Application/Document Date” to reference the most recent updated plans. This may also require changes to the volume, chapter and page numbers cited in the “Comments” column. PPG is providing a suggested revised Attachment 1 that references the appropriate updated documents that previously have been submitted to LDEQ during the permit review process.</p>
LDEQ RESPONSE	<p>LDEQ acknowledges the comment. The Permittee had submitted a final response to comments July 11, 2008. The draft permit was public noticed on July 17, 2008. The content of the submittal would not require a class 2 or 3 modification if submitted outside the draft permit process, but would be processed as a class 1 modification.</p> <p>The revised Part A Application submitted with the July 11, 2008 replaced the Part A Application contained in the draft permit. In addition, the table in Attachment 1 of the draft permit has been edited as suggested by the Permittee to include the most recent submittals for the contingency plan, inspection plan, personnel training and waste analysis plan.</p>
ACTION	<p>The revised Part A Application containing a brief description of additional environmental permits replaced the Part A Application of the draft permit. The July 14, 2008 response to comments contained revised contingency, inspection, personnel training and waste analysis plans. For the contingency, inspection, personnel training and waste analysis plans, the Document Date and EDMS Document Number were deleted and replaced with July 14, 2008 for the Document Date and 37123853 for the EDMS</p>

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Document ID number. The information for arrangements with local authorities was also revised to reference the same document date and EDMS Document ID number.

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ITEM	43
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Fact Sheet, Section I, p. 1
COMMENTS	<p>The last sentence of the first paragraph does not clearly indicate that PPG's existing HSWA permit has already addressed many corrective action requirements. As worded, the last sentence implies that no corrective action has been taken, when in fact, a great deal of the corrective action process has already been required by LDEQ through the HSWA permit issued in 1990. PPG requests that the last sentence of this paragraph be revised and replaced with the following (in italics):</p> <p><i>Provisions for site-wide corrective action are being addressed under the HSWA permit, which is part of the facility's post-closure permit for the WTU Surge Pond (Permit No. LAD008086506-PC1). Pursuant to the HSWA permit, the facility has completed the RCRA Facility Investigation (RFI) and Corrective Measures Study (CMS). Final corrective measures are currently under review by the LDEQ and will be required through revision to Permit No. LAD008086506-PC1.</i></p>
LDEQ RESPONSE	<p>LDEQ acknowledges and concurs with the comment. The HSWA permit was included in the renewal for the WTU Surge Pond Post-Closure Permit. The renewal of the WTU Surge Pond Post-Closure permit will include the final site remedies. This operating permit (LAD008086506-OP-1-RN-1, Activity Number PER19990002) will <u>not</u> contain any condition addressing corrective action final remedy or process at this facility.</p>
ACTION	<p>No action taken. Comments on the fact sheet are included in the final permit to clarify the public record, but the fact sheet is not issued with the final permit.</p>

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ITEM	44
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Fact Sheet, Section II.A., p.2
COMMENTS	<p>PPG requests that the last two sentences of paragraph A. be revised to read as follows:</p> <p><i>This draft hazardous waste permit for operating TSD units will not contain provisions for the management of site-wide corrective action under the HSWA provisions because the HSWA permit is part of the facility's WTU Surge Pond post closure permit. LDEQ is separately reviewing PPG Industries' request for renewal of the WTU Surge Pond post-closure Permit No. LAD008086506-PC, and that post-closure permit will contain the HSWA requirements for site-wide corrective action at the site.</i></p>
LDEQ RESPONSE	LDEQ acknowledges and concurs with the comment. The HSWA requirements will not be addressed in this permit.
ACTION	No action taken. Comments on the fact sheet are included in the final permit to clarify the public record, but the fact sheet is not issued with the final permit.

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ITEM	45
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Fact Sheet, Section III (and global change throughout the Fact Sheet), p.4
COMMENTS	PPG requests that LDEQ revise the term "mercury containing wastes" to "wastes containing mercury" throughout the Fact Sheet.
LDEQ RESPONSE	LDEQ acknowledges and concurs with the comment. The Fact Sheet should have referenced "waste containing mercury" rather than "mercury containing waste".
ACTION	No action taken. Comments on the fact sheet are included in the final permit to clarify the public record, but the fact sheet is not issued with the final permit.

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ITEM	46
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Fact Sheet, Section III, p. 4
COMMENTS	PPG requests that LDEQ change the word "remediation" to "decommissioning" in the last sentence of the second paragraph in this Section.
LDEQ RESPONSE	LDEQ acknowledges and concurs with the comment. The comment refers to the sentence, "Mercury containing waste will continue to be generated from remediation activities." The mercury cells have been demobilized and decommissioning is the appropriate term rather than remediation as the areas are not designated releases.
ACTION	No action taken. Comments on the fact sheet are included in the final permit to clarify the public record, but the fact sheet is not issued with the final permit.

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ITEM	47
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Draft Permit, Fact Sheet, Section IV, p.4.
COMMENTS	In the first sentence of the first paragraph, insert "Treatment, Storage, or Disposal ("TSD")" after the word "existing" and before the word "units".
LDEQ RESPONSE	LDEQ acknowledges and concurs with the comment. The comment refers to the sentence, "The Westlake Facility has two incineration units, one halogen acid furnace (HAF), four existing storage tanks, and four container storage units, which are existing units." The units referred to in this sentence are treatment, storage and disposal units.
ACTION	No action taken. Comments on the fact sheet are included in the final permit to clarify the public record, but the fact sheet is not issued with the final permit.

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ITEM	48
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Fact Sheet, Section IV, p. 4
COMMENTS	In the first sentence of the second paragraph, delete the phrase "and vent gases" from the sentences. The treatment of vent gases is not a hazardous waste management activity as uncontained vent gases are not hazardous wastes.
LDEQ RESPONSE	LDEQ acknowledges and concurs with the comment. Management of uncontained vent gases does not constitute a hazardous waste management activity and should not have been included in the first sentence of the second paragraph as referenced in this comment.
ACTION	No action taken. Comments on the fact sheet are included in the final permit to clarify the public record, but the fact sheet is not issued with the final permit.

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ITEM	49
REFERENCE	Fact Sheet, p. 5
ISSUE	Fact Sheet, Section IV, p. 5 (and global change throughout the Fact Sheet)
COMMENTS	PPG requests that wherever the term "drum" or "Drum" appears, that such term be changed to "container" or "Container". Although PPG loosely refers to some areas as drum storage areas, in fact, they are used to manage both drums and other containers, as described in the permit application. For clarity to the public, the more generic term – "container," should be used.
LDEQ RESPONSE	LDEQ acknowledges and concurs with the comment. The units referred to in the comment are in fact permitted as container storage areas. The term "container" is applicable and is used in the body of the permit.
ACTION	No action taken. Comments on the fact sheet are included in the final permit to clarify the public record, but the fact sheet is not issued with the final permit.

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ITEM	50
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Fact Sheet, Section IV, p.5
COMMENTS	In the second to last sentence of the last paragraph of this section, the Fact Sheet indicates that the RCRA 1 and RCRA 2 areas "are coated with a chemically compatible liner to prevent the release of spilled materials." This statement is incorrect as written. The statement is correct for the RCRA 2 area; but the RCRA 1 area is covered with a steel plate. This information was provided to LDEQ in PPG's response to Notices of Deficiency (1) under LDEQ comment No. 19, Exhibit 12, PPG Response to Chapter 2111.B.1. PPG requests that the Fact Sheet be revised appropriately to reflect this information.
LDEQ RESPONSE	LDEQ acknowledges and concurs with the comment.
ACTION	No action taken. Comments on the fact sheet are included in the final permit to clarify the public record, but the fact sheet is not issued with the final permit.

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ITEM	51
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Fact Sheet, Section VI.A., p. 6
COMMENTS	PPG requests that LDEQ add the citation for the NESHAP MACT standard at the end of the first paragraph of this page. The citation is "National Emission Standards for Hazardous Air Pollutants (NESHAP) from Hazardous Waste Combustion Units, 40 C.F.R. Part 63, Subpart EEE."
LDEQ RESPONSE	LDEQ acknowledges and concurs with the comment. The added citation would clarify the sentence referred to in this comment: "The applicable air emission standards will be the MACT standards for incinerators and boilers and industrial furnaces."
ACTION	No action taken. Comments on the fact sheet are included in the final permit to clarify the public record, but the fact sheet is not issued with the final permit.

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ITEM	52
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Fact Sheet, Section VI.A., p. 6
COMMENTS	In the first sentence of the fourth paragraph on this page, PPG requests that LDEQ delete the word "into" after "mercury contaminated waste" and add "for recycle/recovery in" in its place.
LDEQ RESPONSE	LDEQ acknowledges and concurs with the comment. The addition of the term "recycle/recovery" describes the function of the RCRA exempt Mercury Recovery Unit.
ACTION	No action taken. Comments on the fact sheet are included in the final permit to clarify the public record, but the fact sheet is not issued with the final permit.

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ITEM	53
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Fact Sheet, Section VI.A., p. 6
COMMENTS	In the second to last sentence in the last paragraph of this section, change "remediation" to "decommissioning".
LDEQ RESPONSE	LDEQ acknowledges and concurs with the comment. Mercury contaminated waste is generated from decommissioning activities and not remediation activities.
ACTION	No action taken. Comments on the fact sheet are included in the final permit to clarify the public record, but the fact sheet is not issued with the final permit.

**RESPONSIVENESS SUMMARY
PPG INDUSTRIES, INC, WESTLAKE FACILITY**

**HAZARDOUS WASTE OPERATING PERMIT
PERMIT NUMBER LAD008086506-OP-RN-1
AGENCY INTEREST #1255**

ITEM	54
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Fact Sheet, Section VI.B., p. 7
COMMENTS	<p>In the last paragraph of this section, add the following sentences after the existing third sentence:</p> <p><i>Provisions for site-wide corrective action are being addressed under the HSWA permit, which is part of the facility's post-closure permit for the WTU Surge Pond (Permit No. LAD008086506-PC1). Pursuant to the HSWA permit, the facility has completed the RCRA Facility Investigation (RFI) and Corrective Measures Study (CMS). Final corrective measures will be required through revision to Permit No. LAD008086506-PC1.</i></p>
LDEQ RESPONSE	LDEQ acknowledges and concurs with the comment. The HSWA requirements at the PPG Westlake Facility will be addressed in the renewal for the Permit LAD008086506-PC1. This final post-closure/HSWA permit will contain language to this effect.
ACTION	No action taken. Comments on the fact sheet are included in the final permit to clarify the public record, but the fact sheet is not issued with the final permit.

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ITEM	55
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Fact Sheet, Section VI.C. 1., p. 8
COMMENTS	In the first line at the top of the page, change "remediation" to "decommissioning" and change "areas" to "equipment and process areas". Also, in the second sentence, change "corrective" to "decommissioning."
LDEQ RESPONSE	LDEQ acknowledges and concurs with the comment. The project described in this paragraph involves the closing of the mercury unit for the production of chlorine. Thus, it is proper to describe this project as a decommissioning project rather than a remediation project.
ACTION	No action taken. Comments on the fact sheet are included in the final permit to clarify the public record, but the fact sheet is not issued with the final permit.

**RESPONSIVENESS SUMMARY
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**HAZARDOUS WASTE OPERATING PERMIT
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ITEM	56
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	Fact Sheet, Section VI.C.2, p. 8
COMMENTS	PPG recommends that the last three sentences be deleted. The first two sentences clearly indicate that this is a renewal permit for an existing facility. There is no need to even discuss relocation as that is not required and is not an option.
LDEQ RESPONSE	LDEQ acknowledges the comment and concurs that relocation of any facilities was not part of the final decision of this permit action.
ACTION	No action taken. Comments on the fact sheet are included in the final permit to clarify the public record, but the fact sheet is not issued with the final permit.

**RESPONSIVENESS SUMMARY
PPG INDUSTRIES, INC, WESTLAKE FACILITY**

**HAZARDOUS WASTE OPERATING PERMIT
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ITEM	57
REFERENCE	Comments on Proposed RCRA Permit, PPG Industries, Inc., Lake Charles Complex.
ISSUE	The Permittee's Response to Public Comments submitted During Public Hearing
COMMENTS	<p>Comment: Will PPG be required to use continuous monitoring systems that run all of the time?</p> <p>Response: Yes. All three of the combustion units being permitted for hazardous waste destruction have extensive continuous monitoring systems. The two incinerators and the halogen acid furnace all have CEMS for monitoring carbon monoxide ("CO"). These CEMS must take a reading every fifteen seconds and keep track of one hour rolling averages. If the average exceeds 100 ppm, this will trigger an automatic waste feed cut-off ("AWFCO") that will, as the name implies, immediately cut off the feed of hazardous waste to the unit. CO is chosen as a parameter to monitor because low CO ensures complete burning. The 100 ppm level is set conservatively low – to prevent inefficient burning from ever occurring. Although the hazardous waste still would be effectively destroyed even at levels of CO above 100 ppm, that level ensures that the efficiency will never even approach a level of concern.</p> <p>Further, the units all have continuous temperature monitors to ensure that the temperature inside the combustion chamber never falls below the level where the facility demonstrated compliance during the trial burn. Again, even though a lower temperature may be fine for burning hazardous waste, this level of protection ensures an extra degree of safety. The temperature monitoring system is tied to an AWFCO.</p> <p>Each of the three units also has a scrubber system to prevent any excess chlorine or HCl emissions. Each of these scrubber systems has 2 continuous monitoring systems – one to monitor pH and one to monitor pressure drop across the scrubber. Both of these are tied to AWFCOs</p>

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such that if either of these parameters falls out of range, waste feeds are cut-off, just as they are for the CO monitoring system.

PPG is required to periodically test the AWFCOs to ensure that they are continuing to work as required by the Title V permit and the RCRA rules and permit.

The continuous monitoring systems for the units are subject to the NESHAP rules in 40 CFR Part 63, Subpart A.

Comment: I would like to know more about the upset that took place right after the trial burn in 2004 – how much was released, what was the duration, that sort of thing.

Response: This upset involved the No. 1 Incinerator and consisted of an event where the CO level triggered the AWFCO. There was no release because the AWFCO cut off feeds. The duration that hazardous waste is in the combustion chamber after an AWFCO is triggered is approximately 2 to 3 seconds. This event caused no harm to human health or the environment. It should be noted that such CO events are expected from time to time due to waste feed variability and other factors – that is why the AWFCO system is used – to prevent a problem from ever occurring. The fact that there is a triggering of the AWFCO in and of itself is not a violation. The NESHAP rules in 40 CFR Part 63, Subpart EEE consider CO events triggering an AWFCO to be “excessive” only if there are more than 10 such events in a calendar half (6 month period).

Comment: Years ago the VOST failed, and yet there was a declaration that the trial burn was a success. While the new comprehensive performance test indicated that PPG passed the VOST audit, EPA’s approval letter for the audit indicated that acceptable recoveries can be as much as + or - 50%. That seems not accurate enough.

Response: PPG’s No. 1 and No. 2 Incinerators did pass the rigorous Comprehensive Performance Test required under 40 CFR Part 63, Subpart EEE. The VOST audit is part of the Quality Assurance for the test. Recoveries of +/- 50% are accepted because the system is measuring at extremely low concentrations. Such approach is scientifically defensible. More information on the VOST methodology and its use in combustor performance testing is available in EPA’s Hazardous Waste Combustion Unit Permitting Manual, Component 2 “How to Review a Quality

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Assurance Project Plan” available at this link:

http://www.epa.gov/region6/6pd/rcra_c/manual/comppone2.pdf. This guidance was developed by the EPA Center for Combustion Science and Engineering.

Comment: I think there should be a PSD review – why is PSD not triggered?

Response: The PSD, or Prevention of Significant Deterioration, program is an air program that is implemented per LAC 33:III.509, and any requirements of the PSD rule are reflected in the facility’s Title V air permit. This is not an issue associated with the RCRA permit.

In any case, PSD is triggered only when there is a physical change, or change in method of operation, per LAC 33:III.509. The Title V air permit for the incinerators and the halogen acid furnace (HAF) was already issued and did consider PSD applicability. The Briefing Sheet for the permit, which is part of the permit, concludes that PSD was not applicable.

Comment: Even though modeling shows compliance with the Louisiana and National Ambient Air Quality Standards, PPG emits 546,360 pounds a year of air pollution, which is a lot.

Response: The state and federal ambient air quality standards are set at a level that ensures protection of public health, with an adequate margin of safety. The modeling has demonstrated that PPG’s air emissions are below such standards, thus ensuring that these emissions will not pose any unreasonable risk. (It should be noted that the units subject to the RCRA permit are very low emitters.) PPG is not certain that the 546,360 figure is accurate and refers the commenter to the annual Emissions Inventories submitted to LDEQ under LAC 33:III.918/919 and 5107.

Comment: PPG puts out 1.88 trillion BTUs per year of heat to the atmosphere which could contribute to excess heat in the area.

Response: The vast majority of this heat is used and converted to other forms of useful energy, not emitted to the atmosphere. In addition, PPG uses a number of cooling towers to reduce heat. There are not 1.88 trillion BTUs per year released to the atmosphere.

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PPG uses a wide variety of devices to capture and use excess heat. PPG needs heat for its processes and this is one of its greatest expenses. It would make no economic sense to allow useable waste heat to be dissipated in the atmosphere. Such would result in PPG being required to pay more for expensive natural gas to fire its boilers for steam production.

A good example is the waste heat boiler used with the No. 3 HAF. The purpose of the HAF is to convert hazardous wastes into a product – HCl; however, that process requires burning and produces heat. Instead of allowing that heat to simply escape to the atmosphere, PPG captures the heating value through a waste heat boiler to produce steam for other processes.

Comment: The commenter is concerned about storm surge vulnerability of the PPG facility in the event of a hurricane, which could cause significant storm surge – possibly as much as 25 feet according to SLOSH models.

Response: The commenter did not provide SLOSH modeling data, so PPG cannot comment on the adequacy of the model. However, the RCRA rules require certain design standards to be met to minimize the likelihood of any problems due to flooding. In addition, hurricane preparedness is specifically addressed by PPG's Contingency Plan, which is required by the RCRA rules. Such plan has proven effective during Hurricanes Rita and Ike, which had significant storm surge. PPG did not experience any hazardous waste management issues as a result of following its Contingency Plan. Some of the activities PPG takes when a hurricane is forecast for landing begin well ahead of the projected landfall date. These include accelerating the schedule for sending containerized waste off-site for disposal ahead of the storm's landfall and moving containers/drums of waste to a more protective and/or covered, enclosed waste storage area.

Comment: EPA should not allow surrogates to be used in trial burns/performance testing.

Response: PPG presumes the commenter was referring to EPA and LDEQ's long established practice of allowing (and often encouraging) a facility to use a principle organic hazardous constituent (POHC) that the facility doesn't usually burn during DRE testing rather than using a constituent that the facility actually normally burns.

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The practice of using surrogates is deemed to be environmentally beneficial by the agencies for two reasons: 1) the surrogate is usually chosen because it is considered to be harder to burn/destroy than are the substances the facility usually burns thus ensuring that the combustion unit that can effectively burn a surrogate can certainly more easily destroy the "normal" waste material, and 2) the surrogate is often chosen because it is a safer compound to handle and manage.

There is no scientifically valid reason for not using appropriately chosen surrogates in a trial burn/performance test. Both DEQ and EPA must approve trial burn plans – including plans to use a surrogate. Thus, this choice of whether to allow a surrogate is always subject to the agency's decision, not the Permittee's decision.

**LDEQ
RESPONSE**

The LDEQ acknowledges receipt of the Permittee's comments on the public comments given during the public hearing. The LDEQ responded to the public comments given during the public hearing in Items 1 through 7 of this Responsiveness Summary.

ACTION

No action taken.